

Court File No.: T-306-22

FEDERAL COURT

B E T W E E N:

F I L E D	FEDERAL COURT COUR FÉDÉRALE	D É P O S É
05-APR-2022		
Andrew Murray		
	13	

CANADIAN FRONTLINE NURSES AND KRISTEN NAGLE

Applicants

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF REBECCA COLEMAN

FEDERAL COURT

B E T W E E N:

CANADIAN CIVIL LIBERTIES ASSOCIATION

Applicant

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF REBECCA COLEMAN

FEDERAL COURT

B E T W E E N:

CANADIAN CONSTITUTION FOUNDATION

Applicant

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF REBECCA COLEMAN

FEDERAL COURT

B E T W E E N:

**JEREMIAH JOST, EDWARD CORNELL, VINCENT GIRCYS, and HAROLD
RISTAU**

Applicants

and

**GOVERNOR IN COUNCIL, HER MAJESTY IN RIGHT OF CANADA,
ATTORNEY GENERAL OF CANADA, and MINISTER OF PUBLIC SAFETY AND
EMERGENCY PREPAREDNESS**

Respondents

AFFIDAVIT OF REBECCA COLEMAN

AFFIDAVIT OF REBECCA COLEMAN

I, REBECCA COLEMAN, of the City of Oshawa, in the Regional Municipality of Durham, in the province of Ontario, SWEAR THAT:

1. I am the paralegal with the Department of Justice assigned to this matter. As such, I have knowledge of the matters hereinafter deposed to, except where stated to be based on information and belief. As to those matters, I verily believe them to be true.

2. As part of my work as a paralegal, I have reviewed a number of media articles, official releases and statements, and Court materials relating to “Freedom Convoy 2022”. Official releases and statements and a selection of media articles from a broad spectrum of news sources are provided below in chronological order to assist with background context in these proceedings. This scan is not intended to be exhaustive or representative of the entire collection of media and statements available, but to lay out a chronology of developments reported in the news media and statements made by public officials and various implicated organizations. Court documents from other “Freedom Convoy” court proceedings are provided at the end of my affidavit.

3. On November 19, 2021, the Public Health Agency of Canada announced upcoming changes to Canada’s border measures in relation to COVID-19. The news release was accessed at: <https://www.canada.ca/en/public->

health/news/2021/11/government-of-canada-announces-adjustments-to-canadas-border-measures.html. Attached as **Exhibit A** is a copy of the News Release.

4. Canada Unity, one of the organizing groups in what would become the Freedom Convoy 2022, posted a memorandum of understanding (MOU) on their website in mid-December 2021. Based on news reporting it is my understanding that copies of the MOU were sent by registered mail to members of the Government of Canada on or about December 10, 2021. Attached as **Exhibit B** is a copy of the Memorandum of Understanding located on the Canada Unity website (<https://canada-unity.com/wp-content/uploads/2022/01/Combined-MOU-Dec03.pdf>).

5. On January 13, 2022, the federal government announced travel requirements that applied to truck drivers entering Canada effective January 15, 2022. Attached as **Exhibit C** is a copy of the Statement from the Public Health Agency of Canada, which can also be found at the following link: <https://www.canada.ca/en/public-health/news/2022/01/requirements-for-truckers-entering-canada-in-effect-as-of-january-15-2022.html>. Attached as **Exhibit D** is a copy of an article from the Globe and Mail dated January 13, 2022 titled “Vaccine mandate for cross-border truckers to take effect; Ottawa calls reversal ‘error’”, which can also be found at the following link: <https://www.theglobeandmail.com/politics/article-vaccine-mandate-truckers-cross-border-ottawa-cbsa/>.

6. Around the same time as the announcement at Exhibit C, a national event called “Freedom Convoy 2022” was planned and promoted on social media. The Facebook page “Freedom Convoy 2022” was created on January 14, 2022 and can be accessed at the following link: <https://www.facebook.com/realFreedomConvoy2022>.

7. On January 22, 2022, the Canadian Trucking Alliance released a statement titled: “Canadian Trucking Alliance Statement to Those Engaged in Road/Border Protests”. The statement can be accessed at the following link: <https://cantruck.ca/canadian-trucking-alliance-statement-to-those-engaged-in-road-border-protests/>. A print-out of the statement is attached to this affidavit as **Exhibit E**.

8. On January 26, 2022, the Ottawa Police Service released a statement titled: “Significant traffic disruptions expected this weekend due to demonstrations”. The Statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?newsId=9d1c61b6-8569-4aec-8481-2f32b7f61780>. A print-out of the statement is attached to this affidavit as **Exhibit F**.

9. On or about January 27, 2022, the National Post posted an article titled: “Freedom Convoy plans to gridlock Ottawa until all vaccine mandates repealed”. The article indicates that it was updated on January 28, 2022. This article can be accessed at the following link: <https://nationalpost.com/news/canada/were-done-with-mandates-freedom-convoy-vows-no-violence-as-up-to-2000-vehicles-head-for-ottawa> and a print-out of the article is attached as **Exhibit G** to this affidavit.

10. On or about January 27, 2022, the National Post posted an article titled: "Ottawa police brace for 'parallel groups' when trucker convoy reaches Ottawa: Ottawa police say they are preparing for a range of scenarios this weekend including the potential for violence". This article can be accessed at the following link: <https://nationalpost.com/news/canada/ottawa-police-brace-for-parallel-groups-when-trucker-convoy-reaches-ottawa> and a print-out of the article is attached as **Exhibit H** to this affidavit.

11. On or about January 28, 2022, The Record and the Hamilton Spectator posted an editorial titled: "'Freedom Convoy' must respect peace, order and our government". This article can be accessed at the following links: <https://www.therecord.com/opinion/editorials/2022/01/28/freedom-convoy-must-respect-peace-order-and-our-government.html> ; <https://www.thespec.com/opinion/editorials/2022/01/28/freedom-convoy-must-respect-peace-order-and-our-government.html> and a print-out of the article is attached as **Exhibit I** to this affidavit

12. On or about January 28, 2022, CBC News posted an article titled: "Police on guard against 'lone wolf individuals' as protest convoy arrives in Ottawa". The article indicates that it was updated on January 29, 2022. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/police-weekend-demonstrations-ottawa-1.6331215> and a print-out of the article is attached as **Exhibit J** to this affidavit.

13. On January 28, 2022, the Toronto Star posted an article titled: “As ‘Freedom convoy’ hits Ottawa, Nova Scotia moves to ward off blockade at New Brunswick border”. This article can be accessed at the following link: <https://www.thestar.com/news/canada/2022/01/28/as-freedom-convoy-hits-ottawa-nova-scotia-moves-to-ward-off-blockade-at-new-brunswick-border.html> and a print-out is attached as **Exhibit K** to this affidavit.

14. On January 29, 2022, the Canadian Trucking Alliance released a statement titled: “Statement by Canadian Trucking Alliance President on Ottawa Protests”. The statement can be accessed at the following link: <https://cantruck.ca/statement-by-canadian-trucking-alliance-president-on-ottawa-protests/>. A print-out of the statement is attached to this affidavit as **Exhibit L**.

15. On or about January 29, 2022, Global News posted an article titled: “Some trucker convoy organizers have history of white nationalism, racism”. The article indicates that it was updated on January 31, 2022. The article can be accessed at the following link: <https://globalnews.ca/news/8543281/covid-trucker-convoy-organizers-hate/> and a print-out of the article is attached as **Exhibit M** to this affidavit.

16. On or about January 29, 2022, CBC News posted an article titled: “Thousands opposed to COVID-19 rules converge on Parliament Hill”, and indicates that it was updated on the same day. The article can be accessed at the following link: <https://www.cbc.ca/news/politics/truck-convoy-protest-some-key-players-1.6332312> and a print-out of the article is attached as **Exhibit N** to this affidavit.

17. On or about January 29, 2022, o.canada.com posted an article titled: "Rideau Centre closes after maskless protesters are seen confronting staff". The article can be accessed at the following link: <https://o.canada.com/news/local-news/rideau-centre-closes-after-maskless-protesters-are-seen-confronting-staff> and a print-out of the article is attached as **Exhibit O** to this affidavit.

18. From January 29-30, 2022, the Ottawa Police Service released five statements regarding the "weekend demonstrations". The titles and links to the statements are:

- a. "Update on Weekend Demonstrations", January 29, 2022, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=01/01/2022&page=2&newsId=9a3d07c2-6915-4e4a-b527-c27f9ccee681>
- b. "Update 2: Weekend Demonstrations", January 29, 2022, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=01/01/2022&page=1&newsId=98483401-48b2-4c78-b00b-40ba8f571a39>
- c. "Update 3: Weekend Demonstrations", January 30, 2022, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=01/01/2022&page=1&newsId=52d59a36-1ea9-4bac-a4e4-4859fd6d879c>
- d. "Update 4: Weekend Demonstrations", January 30, 2022, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=01/01/2022&page=1&newsId=1059aaa8-02c9-4617-8b36-7971c3416d2f>
- e. "Update 5: Weekend Demonstration", January 30, 2022, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=01/01/2022&page=1&newsId=9bbfb519-7695-4d88-80be-942baa12c223>

Print-outs of all five of the above statements are attached to this affidavit as **Exhibit P**.

19. On or about January 30, 2022, The Times of Israel posted an article titled: “Swastikas, other hate symbols displayed at Canadian protest against COVID mandates”. This article can be accessed at the following link: <https://www.timesofisrael.com/swastikas-other-hate-symbols-displayed-at-canadian-protest-against-covid-mandates/> and a print-out of the article is attached as **Exhibit Q** to this affidavit.

20. On January 31, 2022, Ottawa Police Service released a statement titled: “Chief Peter Sloly remarks during Media availability – January 31, 2022”. This statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?lang=en&newsId=4e505c6b-0e2e-4a69-a9f0-cfccdc3e542>. A print-out of the statement is attached to this affidavit as **Exhibit R**.

21. On or about January 31, 2022, CTV News Ottawa posted an article titled: “Downtown Ottawa residents describe stress and anxiety of living with ongoing trucker protest”. This article can be accessed at the following link: <https://ottawa.ctvnews.ca/downtown-ottawa-residents-describe-stress-and-anxiety-of-living-with-ongoing-trucker-protest-1.5762108> and a print-out of the article is attached as **Exhibit S** to this affidavit.

22. On or about January 31, 2022, APTN National News posted an article titled: “Soft police approach to Ottawa anti-vax protest reveals ‘pure racism’ say critics”. The article can be accessed at the following link: <https://www.aptnnews.ca/national->

[news/soft-police-approach-to-ottawa-anti-vax-protest-reveals-pure-racism-say-critics/](https://www.ottawapolicy.com/news/soft-police-approach-to-ottawa-anti-vax-protest-reveals-pure-racism-say-critics/)

and a print-out of the article is attached as **Exhibit T** to this affidavit.

23. On February 1, 2022, Ottawa Police Service released a statement titled: “Two arrests in demonstration-related investigations”. The statement can be accessed at the following link:

<https://www.ottawapolicy.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=8&newsId=bbbbbb85e-4056-4321-954c-5cf034dc3f07>. A print-out of the

statement is attached to this affidavit as **Exhibit U**.

24. On or about February 1, 2022, CNN posted an article titled: “Ottawa to establish hate incident hotline amid reports of racism and anti-Semitism during protests over Covid-19 mandates”. The article can be accessed at the following link:

<https://www.cnn.com/2022/02/01/americas/canada-ottawa-protests-hate-incidents-hotline/index.html> and a print-out of the article is attached as **Exhibit V** to this

affidavit.

25. On or about February 1, 2022, Ottawa Citizen posted a local news article titled: “Ambulances pelted with rocks during protest; health workers, patients face added stress, delays”. This article can be accessed at the following link:

<https://ottawacitizen.com/news/local-news/ambulances-pelted-with-rocks-during-protest-health-workers-patients-face-added-stress-delays> and a print-out of the article

is attached as **Exhibit W** to this affidavit.

26. On or about February 1, 2022, CTV News Ottawa posted an article titled: “Some residents in downtown Ottawa standing up to the trucker convoy”. This article can be accessed at the following link: <https://ottawa.ctvnews.ca/some-residents-in-downtown-ottawa-standing-up-to-the-trucker-convoy-1.5763579> and a print-out of the article is attached as **Exhibit X** to this affidavit.

27. On February 1, 2022, the Royal Canadian Mounted Police (RCMP) (Alberta) issued a statement titled: “Alberta RCMP statement regarding Coutts border assembly”. The statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-statement-coutts-border-assembly>. A print-out of the statement is attached to this affidavit as **Exhibit Y**.

28. On or about February 1, 2022, the Calgary Herald posted an article titled: “Violence reported at Coutts as RCMP attempt to break up blockade”. The article can be accessed at the following link: <https://calgaryherald.com/news/local-news/rcmp-enforcement-possible-as-coutts-border-blockade-reaches-fourth-day> and a print-out is attached as **Exhibit Z** to this affidavit.

29. On or about February 2, 2022, CTV News Ottawa posted an article titled: “Truck convoy costs Ottawa’s busiest mall millions in lost revenue”. The article can be accessed at the following link: <https://ottawa.ctvnews.ca/truck-convoy-costs-ottawa-s-busiest-mall-millions-in-lost-revenue-1.5765373> and a print-out of the article is attached as **Exhibit AA** to this affidavit.

30. On or about February 2, 2022, CTV News Ottawa posted an article titled: “Ottawa police expect ‘Freedom Convoy’ protest to grow this weekend” and indicates

that it was updated on the same day. This article can be accessed at the following link: <https://ottawa.ctvnews.ca/ottawa-police-expect-freedom-convoy-protest-to-grow-this-weekend-1.5764002> and a print-out of the article is attached as **Exhibit BB** to this affidavit.

31. On or about February 2, 2022, the Ottawa Citizen posted an article titled: “Diesel fumes bring risk of serious health issues for Centretown residents, experts say”. This article can be accessed at the following link: <https://ottawacitizen.com/news/local-news/diesel-fumes-bring-risk-of-serious-health-issues-for-centretown-residents-experts-say> and a print-out of the article is attached as **Exhibit CC** to this affidavit.

32. On February 2, 2022, the RCMP (Alberta) issued a statement titled: “Alberta RCMP statement regarding Coutts border assembly – Update #1”. This statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-statement-coutts-border-assembly-update-1>. A print-out of the statement is attached to this affidavit as **Exhibit DD**.

33. On or about February 2, 2022, the Washington Post posted an article titled: “‘Significant element’ from U.S. involved in self-described ‘Freedom Convoy’ in Canada, official says” and indicates it was last updated the same day. This article can be accessed at the following link: <https://www.washingtonpost.com/world/2022/02/02/freedom-convoy-alberta-blockade-vaccine-mandate-protests/> and a print-out of the article is attached as **Exhibit EE** to this affidavit.

34. On or about February 2, 2022, APTN National News posted an article titled: “Algonquin Nation issues statement saying it ‘does not support’ ceremony, and truckers convoy actions on traditional territory”. This article can be accessed at the following link: <https://www.aptnnews.ca/national-news/algouquin-nation-truckers-convoy-traditional-territory-ottawa/> and a print-out of the article is attached as **Exhibit FF** to this affidavit.

35. On February 3, 2022, the Ottawa Police Service released a statement titled: “Demonstration-Related Traffic Enforcement in Downtown Neighbourhoods”. This statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?newsId=3eae7a92-fdab-4477-9625-e40cf0823eba>. A print-out of the statement is attached to this affidavit as **Exhibit GG**.

36. On or about February 3, 2022, APTN National News posted an article titled: “Tungasuvvingat Inuit says truckers protest in Ottawa causing ‘anxiety and increased fear’”. This article can be accessed at the following link: <https://www.aptnnews.ca/national-news/tungasuvvingat-inuit-says-truckers-protest-in-ottawa-causing-anxiety-and-increased-fear/> and a print-out of the article is attached as **Exhibit HH** to this affidavit.

37. On or about February 4, 2022, CBC News posted an article titled: “GoFundMe and the Ottawa convoy protest – your questions answered” and it was updated that same day. This article can be accessed at the following link:

<https://www.cbc.ca/news/politics/questions-answers-gofundme-convoy-1.6338932>

and a print-out of the article is attached as **Exhibit II** to this affidavit.

38. On February 4, 2022, the Ottawa Police Service released a statement titled: “Ottawa Police Service Implements Increased Measures to Protect Downtown Neighbourhoods”. This statement can be accessed at the following link:

<https://www.ottawapolice.ca/Modules/News/index.aspx?newsId=0f31ea4e-110e-434c-b817-04c3d23f1ede>. A print-out of the statement is attached to this affidavit as **Exhibit JJ**.

39. On or about February 4, 2022, CTV News Ottawa posted an article titled: “Tow truck companies rejecting Ottawa police request for help: source”. This article can be accessed at the following link: <https://ottawa.ctvnews.ca/tow-truck-companies-rejecting-ottawa-police-request-for-help-source-1.5768436> and a print-out of the article is attached as **Exhibit KK** to this affidavit.

40. On or about February 5, 2022, the Ottawa Citizen posted an article titled: “Truck Convoy: ‘Our city is under siege’.” This article can be accessed at the following link: <https://ottawacitizen.com/news/local-news/truck-convoy-residents-police-brace-as-protest-numbers-expected-to-swell> and a print-out of the article is attached as **Exhibit LL** to this affidavit.

41. On February 5, 2022, the Ottawa Police Service released a statement titled: “Ottawa Police Enforce Perimeter Containment Measures, Charges laid, new RCMP resources announced”. This statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?lang=en&newsId=73848b16-7644-4e56-95c0-767136eff481>. A print-out of the statement is attached to this affidavit as **Exhibit MM**.

42. On or about February 5, 2022, CBC News posted an article titled: “No end in sight to Ottawa protests, not enough resources, says police chief”. The article indicates that it was last updated on February 6, 2022. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/ottawa-protests-police-chief-no-end-in-sight-1.6341192> and a print-out of the article is attached as **Exhibit NN** to this affidavit.

43. On February 5, 2022, the Vancouver Police released a statement titled: “Vancouver Police arrest five during day-long protests”. This statement can be accessed at the following link: <https://vpd.ca/news/2022/02/05/vancouver-police-arrest-five-during-day-long-protests/>. A print-out of the statement is attached to this affidavit as **Exhibit OO**.

44. On February 6, 2022, Cadillac Fairview released a statement titled: “Statement regarding the ongoing closure of CF Rideau Centre”. The Statement can be accessed at the following link: <https://www.cadillacfairview.com/news/Statement-regarding-the-ongoing-closure-of-CF-Rideau-Centre/>. A print-out of the statement is attached to this affidavit as **Exhibit PP**.

45. On February 6, 2022, the City of Ottawa released a statement titled: “Mayor Watson declares state of emergency for Ottawa due to ongoing demonstration”. This statement can be accessed at the following link: <https://ottawa.ca/en/news/mayor-watson-declares-state-emergency-ottawa-due-ongoing-demonstration>. A print-out of the statement is attached to this affidavit as **Exhibit QQ**.

46. On or about February 6, 2022 the Ottawa Citizen posted an article titled: “Province says Ottawa has tools needed to end convoy protest; Watson warns city authorities ‘outnumbered’ by protesters”. The article indicates that it may have been updated on February 7, 2022. This article can be accessed at the following link: <https://ottawacitizen.com/news/local-news/province-says-ottawa-has-tools-needed-to-end-convoy-protest-watson-warns-city-authorities-outnumbered-by-protesters> and a print-out of the article is attached as **Exhibit RR** to this affidavit.

47. On February 6, 2022, Ottawa Police Service released a two statements:

- a. “450+ tickets issued since Saturday morning”,
<https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=6&newsId=0087e6b4-7217-44b3-b17c-124b273da999>
- b. “7 people arrested, 100 tickets issued in Demonstration-Related Enforcement”,
<https://www.ottawapolice.ca/Modules/News/index.aspx?lang=en&newsId=eea9ddff-2d3a-4327-8a2b-34fa5c39579c>.

Print-outs of the above statements are attached to this affidavit as **Exhibit SS**.

48. On or about February 7, 2022, Deutsche Welle (DW.com) posted an article titled: "Canada: Ottawa declares state of emergency amid COVID-19 protests." This article can be accessed at the following link: <https://www.dw.com/en/canada-ottawa-declares-state-of-emergency-amid-covid-19-protests/a-60681441> and a print-out of the article is attached as **Exhibit TT** to this affidavit.

49. On or about February 7, 2022, CBC News posted an article titled: "Centretown ice cream shop closes after worker reports assault on way to work" and it was updated on the same day. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/moo-shu-ice-cream-employee-assaulted-ottawa-1.6341207> and a print-out of the article is attached as **Exhibit UU** to this affidavit.

50. On or about February 7, 2022, CTV News Ottawa posted an article titled: "Protesters quickly adapting to police measures: Ottawa chief" and it indicates that it was updated the same day. This article can be accessed at the following link: <https://ottawa.ctvnews.ca/protesters-quickly-adapting-to-police-measures-ottawa-chief-1.5770548> and a print-out of the article is attached as **Exhibit VV** to this affidavit.

51. On February 7, 2022, Aljazeera.com posted an article titled: "Canada's NDP leader says trucker convoy aims to 'overthrow' gov't". This article can be accessed at the following link: <https://www.aljazeera.com/news/2022/2/7/canada-ndp-leader-trucker-convoy-aims-to-overthrow-govt> and a print-out of the article is attached as **Exhibit WW** to this affidavit.

52. On February 7, 2022, CTV News Ottawa posted an article titled: “Ottawa police dealing with threats, fake calls tying up resources” and it was updated on the same day. This article can be accessed from the following link: <https://ottawa.ctvnews.ca/ottawa-police-dealing-with-threats-fake-calls-tying-up-resources-1.5771623> and a print-out of this article is attached as **Exhibit XX** to this affidavit.

53. On February 7, 2022, the City of Ottawa released a statement titled: “Council condemns demonstration and asks for additional support”. This statement can be accessed at the following link: <https://ottawa.ca/en/news/council-condemns-demonstration-and-asks-additional-support>. A print-out of the statement is attached to this affidavit as **Exhibit YY**.

54. On February 7, 2022, Jim Watson, Mayor of Ottawa released his letter to Prime Minister Justin Trudeau and Minister of Public Safety, Marco Mendicino. A copy of the letter can be accessed at the following link: https://www.scribd.com/document/557485524/Letter-to-PM-Trudeau-and-Minister-Mendicino-RE-Enforcement-Resources-Request-Feb-7-2022#from_embed. Attached as **Exhibit ZZ** is a print-out of this link with the letter embedded.

55. On February 7, 2022, Public Safety Canada released a statement titled: “Joint Statement from Ministers Blair, LeBlanc, Fortier, Mendicino and Alghabra”. The statement can be accessed at the following link: <https://www.canada.ca/en/public-safety-canada/news/2022/02/joint-statement-from-ministers-blair-leblanc-fortier-mendicino-and-alghabra.html>. A print-out of the statement is attached to this affidavit as **Exhibit AAA**.

56. On or about February 7, 2022 the National Post posted an article from The Canadian Press titled: “Judge has ‘heard enough,’ grants interim injunction against truckers honking in Ottawa”. This article can be accessed at the following link: <https://nationalpost.com/news/canada/judge-has-heard-enough-grants-injunction-against-truckers-honking-in-ottawa> and a print-out of the article is attached as **Exhibit BBB** to this affidavit.

57. The February 7, 2022 injunction order can be accessed at the following link: <https://www.truckerrelease.ca/order.pdf>. The injunction order was also posted online by the Ottawa Police Service through a statement released on February 8, 2022 titled: “Enforcement of Court Order in Downtown Core”. The statement is accessible at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=6&newsId=567bc422-5221-4f1b-9cf1-d57760e39f18>. A print out of the injunction order and the Ottawa Police Service statement regarding same are attached as **Exhibit CCC** to this affidavit

58. On February 8, 2022, Ottawa Police Service released a statement titled: “Ottawa Police Service Makes 23 Arrests in Relation to Demonstration – 1,300 Tickets Issued”. The statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=6&newsId=461f5055-3bb2-4c3b-895e-94d0dbad8588>. A print-out of the statement is attached to this affidavit as **Exhibit DDD**.

59. On February 8, 2022, Windsor Police Service released a statement titled: “Update in Relation to Gatherings and Demonstrations on Huron Church Road at the Ambassador Bridge”. This statement can be accessed at the following link: <https://windsorpolice.ca/newsroom/news-update/february/Pages/February-8-2022-Update-1.aspx>. A print-out of this statement is attached to this affidavit as **Exhibit EEE**.

60. On or about February 8, 2022 CBC News posted an article titled: “Large number of children among protesters hampering response, police say” and it indicates it was updated on the same day. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/ottawa-police-update-convoy-february-8-protest-1.6343814> and a print-out of the article is attached as **Exhibit FFF** to this affidavit. An article entitled “The children of the ‘Freedom Convoy’: Kids with protesting parents complicate police response” was also posted by the Washington Post on February 17, 2022. This article can be accessed at the following link: <https://www.washingtonpost.com/world/2022/02/17/freedom-convoy-children-ottawa-protest/> and a print-out of the article is attached as **Exhibit GGG** to this affidavit.

61. On or about February 8, 2022, ABC News posted an article titled: “COVID-19 protests threaten border trade between Canada, US”. This article can be accessed at the following link: <https://abcnews.go.com/International/wireStory/canadas-covid-19-protests-threaten-border-trade-us-82749571> and a print-out of the article is attached as **Exhibit HHH** to this affidavit.

62. On or about February 8, 2022, CBC News posted an article titled: “Tow truck operator under attack after removing illegal shack at protesters’ request”, and indicates that it was updated on the same day. The article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/ottawa-convoy-protest-shack-towed-reaction-1.6342357> and a print-out of the article is attached as **Exhibit III** to this affidavit.

63. On February 9, 2022, Ottawa Police Service released a statement titled: “Child and youth safety at Ottawa demonstrations”. The statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=6&newsId=a6a015c7-f687-4397-af48-2e37f9df5c4f>. A print-out of the statement is attached to this affidavit as **Exhibit JJJ**.

64. On or about February 9, 2022, Global News posted an article titled: “Windsor officials requesting assistance as Ambassador Bridge blockade continues”. The article indicates that it was updated on February 10, 2022. This article can be accessed at the following link: <https://globalnews.ca/news/8606062/southern-ontario-convoy-demonstrations/> and a print-out of the article is attached as **Exhibit KKK** to this affidavit.

65. On February 9, 2022, Canada-United States Business Association (CUSBA) released a statement titled: “Canadian, US Business Associations Call for Immediate Action to Open Ambassador Bridge” (which is dated February 8, 2022). This statement can be accessed at the following link: <https://www.cusbaonline.com/canadian-us->

[business-associations-call-for-immediate-action-to-open-ambassador-bridge](#). A print-out of the statement is attached to this affidavit as **Exhibit LLL**.

66. On or about February 10, 2022, CityNews posted an article titled: “Police confirm flood of calls came from truck convoy protesters, U.S.-based addresses”. This article can be accessed at the following link: <https://ottawa.citynews.ca/police-beat/police-confirm-flood-of-calls-came-from-truck-convoy-protesters-us-based-addresses-5051149> and a print-out of the article is attached as **Exhibit MMM** to this affidavit.

67. On February 10, 2022, Ottawa Police Service released a statement titled: “Ottawa Police Service Works to Reduce Occupation Footprint - - 1,775 Tickets Issued”. The statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=5&newsId=6a1ea331-1152-4592-a365-884abcd8778c>. A print-out of the statement is attached to this affidavit as **Exhibit NNN**.

68. On February 10, 2022, the Prime Minister released a statement titled: “Prime Minister Justin Trudeau convenes the Incident Response Group”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/10/prime-minister-justin-trudeau-convenes-incident-response-group>. A print-out of this statement is attached to this affidavit as **Exhibit OOO**.

69. On February 10, 2022, the National Post posted an article titled: “Protest organizer: No intent to topple government ... and no plan to leave until COVID mandates lifted”. This article can be accessed at the following link: <https://nationalpost.com/news/politics/protest-organizer-no-intent-to-topple-government-and-no-plan-to-leave-until-covid-mandates-lifted> and a print-out of the article is attached as **Exhibit PPP** to this affidavit.

70. On February 11, 2022, the RCMP (Manitoba) released a statement titled: “Blockade continuing to block border in Emerson”. This statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/blockade-continuing-block-border-emerson>. A print-out of this statement is attached to this affidavit at **Exhibit QQQ**.

71. On February 11, 2022, the Prime Minister released a statement titled: “Prime Minister Justin Trudeau speaks with the President of the United States of America Joe Biden”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/11/prime-minister-justin-trudeau-speaks-president-united-states-america-joe-0> and a print-out of this statement is attached to this affidavit as **Exhibit RRR**.

72. On or about February 11, 2022, several different organizations issued statements related to these events, including the following:

- a. Canada's Building Trades Unions issued a statement which can be accessed at the following link: <https://buildingtrades.ca/statement-by-canadas-building-trades-unions-on-blockades/>
- b. The Canadian Cattlemen's Association issued a statement titled: "Canadian Agriculture and Food Industry Calls for Government Action to Restore Essential Transport and Trade Corridors". This statement can be accessed at the following link: <https://www.cattle.ca/canadian-agriculture-and-food-industry-calls-for-government-action-to-restore-essential-transport-and-trade-corridors>
- c. Unifor issued a statement titled: "Unifor condemns 'Freedom Convoy' actions". This statement can be accessed at the following link: <https://www.unifor.org/news/all-news/unifor-condemns-freedom-convoy-actions>.
- d. Amnesty International Canada issued a statement titled: "Amnesty International Canada Statement on 'Freedom Convoy' Blockade". This statement can be accessed at the following link: <https://amnesty.ca/news/ottawa-protests-statement-11-feb-2022/> .

Print-outs of the above four statements are attached to this affidavit as **Exhibit SSS**.

73. On February 11, 2022, the Province of Ontario declared a State of Emergency and issued the following regulations on February 11 and 12, 2022: O. Reg 69/22 (Declaration of Emergency), O Reg. 70/22 (Confirmation of Declaration of Emergency) and O. Reg. 71/22 (Critical Infrastructure and Highways). These regulations can be accessed at the following links:

- (a) <https://www.ontario.ca/laws/regulation/r22069>
- (b) <https://www.ontario.ca/laws/regulation/220070>
- (c) <https://www.ontario.ca/laws/regulation/220071>

Print-outs of the above regulations are attached to this affidavit as **Exhibit TTT**.

Ontario Premier Doug Ford's press conference declaring the State of Emergency has been posted on CPAC's YouTube channel with the title "Truck protests: Ontario

Premier Doug Ford declares province-wide state of emergency – Feb. 11, 2022” and can be viewed at the following link: <https://www.youtube.com/watch?v=LIjECIc4hAo>.

74. On February 11, 2022, Windsor Police Service released a statement titled: “Message to Demonstrators from Windsor Police Service”. This statement can be accessed at the following link: <https://windsorpolice.ca/newsroom/news-update/february/Pages/February-10-2022-Update-1.aspx>. A print-out of this statement is attached to this affidavit as **Exhibit UUU**.

75. On or about February 11, 2022, The Globe and Mail published an article titled: “Injunction granted to clear Ambassador Bridge blockade after Doug Ford announces state of emergency”. This article can be accessed at the following link: <https://www.theglobeandmail.com/canada/article-ontario-premier-ford-announces-state-of-emergency-over-trucker/> and a print-out of the article is attached as **Exhibit VVV** to this affidavit.

76. On February 11, 2022, the City of Windsor issued a press release including a copy of the injunction order. The press release and injunction order can be accessed by the following link: <https://www.citywindsor.ca/Newsroom/Pages/Injunction-Granted-by-Ontario-Superior-Court.aspx> and a print-out of the press release and order are attached to this affidavit as **Exhibit WWW**.

77. On or about February 11, 2022, CNBC posted an article titled: “U.S. pressures Canadian authorities to end border blockades” and indicates that it was last updated on the same day. This article can be accessed at the following link: <https://www.cnbc.com/2022/02/11/us-urges-canada-to-use-federal-powers-to-ease->

[border-protest-disruption.html](#) and a print-out of this article is attached as **Exhibit XXX** to this affidavit.

78. On February 12, 2022, the Prime Minister released a statement titled: “Prime Minister Justin Trudeau convenes the Incident Response Group on the ongoing illegal blockades”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/12/prime-minister-justin-trudeau-convenes-incident-response-group-ongoing> and a print-out of this statement is attached to this affidavit as **Exhibit YYY**.

79. On February 12, 2022, Ottawa Police Service released two statements:

- a. “Ottawa Police Service Deploying All Available Officers to Enforce Neighbourhood Safety” which can be accessed at the following link:
<https://www.ottawapolice.ca/Modules/News/index.aspx?lang=en&newsId=64873352-2809-47ce-bc46-f57f4bf05d45>.
- b. “Ottawa Police Service Establish Integrated Command Centre to Coordinate Enforcement”, which can be accessed at the following link:
<https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=5&newsId=bed085e8-7c29-4b03-beb5-85862d682fd4>

Print-outs of the above two statements are attached to this affidavit as **Exhibit ZZZ**.

80. On February 12, 2022, the RCMP (Manitoba) released a statement titled: “UPDATE #2 – Emerson border crossing – February 12, 2022”. The statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/update-2-emerson-border-crossing-february-12-2022> and a print-out of the statement is attached to this affidavit as **Exhibit AAAA**.

81. On or about February 12, 2022, CBC News posted an article titled: “Vaccine mandate protesters force highway closure at Canada-U.S. border in Surrey as rallies enter 3rd weekend” and it was updated on the same day. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/british-columbia/surrey-border-protest-feb-12-1.6349787> and a print-out of the article is attached as **Exhibit BBBB** to this affidavit.

82. Also on or about February 12, 2022, The Toronto Star posted an article titled: “Protestors square off with police at Ambassador Bridge, as demonstrations across Ontario continue despite emergency measures” and indicates that it was updated on February 13, 2022. This article can be accessed at the following link: <https://www.thestar.com/politics/federal/2022/02/12/ottawa-freedom-convoy-protests-continue-despite-ontarios-new-emergency-measures.html> and a print-out of the article is attached as **Exhibit CCCC** to this affidavit.

83. On or about February 12, 2022, CityNews posted an article titled: “Protesters tear down fence erected to protect National War Memorial”. This article can be accessed at the following link: <https://ottawa.citynews.ca/local-news/protesters-tear-down-fence-erected-to-protect-national-war-memorial-5058238> and a print-out of the article is attached as **Exhibit DDDD** to this affidavit.

84. On or about February 12, 2022, the Detroit Free Press posted an article titled: “Trucks are gone from Ambassador Bridge, but more protesters arrive on foot”, and it indicates it was updated the same day. The article can be accessed from the following link: <https://www.freep.com/story/news/local/michigan/2022/02/12/ambassador-bridge-truck-protest-police/6764936001/> and a print-out of the article is attached as **Exhibit EEEE** to this affidavit.

85. On February 13, 2022, the RCMP (Manitoba) released a statement titled: “UPDATE #3 – Emerson border crossing – February 13, 2022” and can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/update-3-emerson-border-crossing-february-13-2022> and a print-out of the statement is attached to this affidavit as **Exhibit FFFF**.

86. On February 13, 2022, the RCMP (BC) released two statements:
- a. “Update on situation near the Pacific Highway Border Crossing” and can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73453>.
 - b. “Update: Arrests at protest near Pacific Highway Border Crossing” and can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73452>.

Print-outs of these two statements are attached to this affidavit as **Exhibit GGGG**.

87. On February 13, 2022, Windsor Police Services released a statement titled: “Demonstration Update”. This statement can be accessed at the following link: <https://windsorpolice.ca/newsroom/news-update/february/Pages/February-13-2022-Update-1.aspx> and a print-out of this statement is attached to this affidavit as **Exhibit HHHH**.

88. On February 14, 2022, the RCMP (Alberta) released a statement titled: “Alberta RCMP make arrests at Coutts Border Blockade”. This statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-make-arrests-coutts-border-blockade>. A further statement was released titled: “Alberta RCMP make arrests at Coutts Border Blockade – Update 1” and can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-make-arrests-coutts-border-blockade-update-1>. Print-outs of these statements are attached to this affidavit as **Exhibit IIII**.

89. On February 14, 2022, the RCMP (BC) released a statement titled: “Law enforcement activity continues near the Pacific Highway Border Crossing”. This statement can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73467> and a print-out of this statement is attached to this affidavit as **Exhibit JJJJ**.

90. On February 14, 2022, Windsor Police Service released a statement titled: “Police Road Closure Update”. This statement can be accessed at the following link: <https://windsorpolice.ca/newsroom/news-update/february/Pages/February-14-2022-Update-1.aspx> and a print-out of this statement is attached as **Exhibit KKKK**.

91. On or about February 14, 2022, CBC News posted an article titled: “3 weekends, 1 hot tub: Ottawa residents reach protest boiling point” and indicates that it was last updated on the same day. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/counter-protests-mayor-deal-anger-police-1.6350450> and a print-out of the article is attached as **Exhibit LLLL** of this affidavit.

92. On February 14, 2022, Public Safety Canada released a statement titled: “Federal Government declares a public order emergency under the *Emergencies Act* to end disruptions, blockades and the occupation of the city of Ottawa”. The statement can be accessed at the following link: <https://www.canada.ca/en/public-safety-canada/news/2022/02/federal-government-declares-a-public-order-emergency-under-the-emergencies-act-to-end-disruptions-blockades-and-the-occupation-of-the-city-of-ottawa.html> and a print-out of the statement is attached to this affidavit as **Exhibit MMMM**.

93. On or about February 14, 2022, The Globe and Mail published an article titled: “Prime Minister Justin Trudeau invokes Emergencies Act to try to bring an end to the blockades”. The article indicates that it was updated on February 15, 2022. This article can be accessed at the following link: <https://www.theglobeandmail.com/politics/article-prime-minister-trudeau-to-discuss-ending-trucker-blockades-with-first/> and a print-out of the article is attached as **Exhibit NNNN** to this affidavit.

94. On or about February 14, 2022, The Toronto Star posted an article titled: “Justin Trudeau invokes Emergencies Act to stop convoy protests”. The article indicates that

it was updated on February 15, 2022. This article can be accessed at the following link: <https://www.thestar.com/politics/federal/2022/02/14/ottawa-protesters-remain-defiant-as-federal-government-ramps-up-emergency-response.html?rf> and a print-out of the article is attached as **Exhibit OOOO** to this affidavit.

95. On February 15, 2022, the Department of Finance Canada released a statement titled: “Canada invokes the *Emergencies Act* to limit funding of illegal blockades and restore public order”. The statement can be accessed at the following link: <https://www.canada.ca/en/department-finance/news/2022/02/canada-invokes-the-emergencies-act-to-limit-funding-of-illegal-blockades-and-restore-public-order.html> and a print-out of the statement is attached to this affidavit as **Exhibit PPPP**.

96. On February 15, 2022, the Deputy Prime Minister of Canada, Chrystia Freeland released a statement titled: “Canada invokes the *Emergencies Act* to limit funding of illegal blockades and restore public order”. This statement can be accessed at the following link: <https://deputypm.canada.ca/en/news/news-releases/2022/02/15/canada-invokes-emergencies-act-limit-funding-illegal-blockades-and> and a print-out of the statement is attached to this affidavit as **Exhibit QQQQ**.

97. On February 15, 2022, the RCMP (BC) released a statement titled: “Arrests at the Pacific Highway Border Crossing”. This statement can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73485> and a print-out of this statement is attached to this affidavit as **Exhibit RRRR**.

98. On or about February 15, 2022, Global News posted an article titled: “Ottawa police Chief Peter Sloly resigns amid ‘freedom convoy’ blockade” and indicates that it was last updated on the same day. This article can be accessed at the following link: <https://globalnews.ca/news/8621091/ottawa-police-peter-sloly-resigns/> and a print-out of the article is attached as **Exhibit SSSS** to this affidavit.

99. On February 15, 2022, the RCMP (Alberta) released two statements:

- a. “Alberta RCMP make arrests at Coutts Border Blockade – Update 2”, <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-update-the-coutts-border-protests>, which is a video statement
- b. “Alberta RCMP make arrests at Coutts Border Blockade – Update 3”, <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-make-arrests-coutts-border-blockade-update-3>

A print-out of the statement relating to Update 3 is attached to this affidavit as **Exhibit TTTT**.

100. On February 15, 2022, the RCMP (Manitoba) released a statement titled: “Update #4- Emerson Border Crossing”. The statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/statement-chief-superintendent-rob-hill-officer-charge-criminal-operations-the-manitoba-0> and a print-out of this statement is attached to this affidavit as **Exhibit UUUU**.

101. On February 15, 2022, Windsor Police Service released a statement titled: “Police Enforcement Results Since the Onset of the Demonstrations”. This statement can be accessed at the following link: <https://windsorpolice.ca/newsroom/news-update/february/Pages/February-15-2022-Update-2.aspx> and a print-out of the statement is attached to this affidavit as **Exhibit VVVV**.

102. On February 15, 2022, the Winnipeg Free Press posted an article titled: “Premier’s letter to PM contrasts with public remarks about blockade”. This article can be accessed at the following link: <https://www.winnipegfreepress.com/local/premiers-letter-to-pm-contrasts-with-public-remarks-about-blockade-576213742.html> and a print-out of the article is attached as **Exhibit WWW** to this affidavit.

103. On February 16, 2022, Ottawa Police Service released three statements:

- a. “Unified Command focused on Safe Resolution to Unlawful Protests”, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=5&newsId=0aae45ba-df82-490c-9bf6-a17426127c30>
- b. “A further Notice to Demonstrators”, <https://www.ottawapolice.ca/Modules/News/index.aspx?lang=en&newsId=1bc1b5ab-51e3-4860-8937-b181d4475989>
- c. “Statement by Interim Chief Steve Bell to City Council”, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=4&newsId=1e4940bf-a4cc-47b8-a22a-a3975191957a>

Print-outs of the above statements are attached to this affidavit as **Exhibit XXXX**.

104. On or about February 16, 2022, The Globe and Mail published an article titled: “Police issue order for Ottawa convoy protestors to leave immediately”. This article can be accessed at the following link: <https://www.theglobeandmail.com/politics/article-police-issue-order-for-ottawa-convoy-protesters-to-leave-immediately/> and a print-out of the article is attached as **Exhibit YYYY** to this affidavit.

105. On February 16, 2022, Prime Minister Trudeau released a statement titled: “Prime Minister Justin Trudeau convenes the Incident Response Group on the ongoing illegal blockades”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/16/prime-minister-justin-trudeau-convenes-incident-response-group-ongoing> and a print-out of the statement is attached to this affidavit as **Exhibit ZZZZ**.

106. On February 16, 2022, the RCMP (Manitoba) released a statement titled: “Update #5 – Blockade at Emerson border crossing now cleared”. This statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/update-5-blockade-emerson-border-crossing-now-cleared> and a print-out of the statement is attached to this affidavit as **Exhibit AAAAAA**.

107. On February 17, 2022, Prime Minister Trudeau released a statement titled: “Prime Minister Justin Trudeau convenes the fifth Incident Response Group meeting on the illegal blockade and occupations”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/17/prime-minister-justin-trudeau-convenes-fifth-incident-response-group> and a print-out of the statement is attached to this affidavit as **Exhibit BBBB**.

108. On February 17, 2022, Ottawa Police Service released a statement titled: “Secured Area Established”. This statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?newsId=55f169a4-101f-4860-83c6-8c645f9bfe86> and a print-out of the statement is attached to this affidavit as **Exhibit CCCCC**.

109. On February 17, 2022, The New York Times posted an opinion article titled: “The Giddy, Terrifying Siege of Ottawa”. The opinion article can be accessed at the following link: <https://www.nytimes.com/2022/02/17/opinion/ottawa-protest-convoy.html> and a print-out is attached as **Exhibit DDDDD** to this affidavit.

110. On February 18, 2022, the Speaker of the House of Commons, Hon. Anthony Rota, M.P., released a statement titled: “Police operation – House will not sit on Friday, February 18”. This statement can be accessed at the following link: <https://www.ourcommons.ca/Content/Newsroom/Articles/News-Speaker-No-Sitting-18-02-2022-e.pdf> and a print-out of the statement is attached to this affidavit as **Exhibit EEEEE**.

111. On February 18, 2022, Prime Minister Trudeau released a statement titled: “Prime Minister Justin Trudeau convenes the sixth Incident Response Group meeting on the illegal blockade and occupations”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/18/prime-minister-justin-trudeau-convenes-sixth-incident-response-group> and a print-out of the statement is attached to this affidavit as **Exhibit FFFFF**.

112. On or about February 18, 2022, the Ottawa Citizen posted an article titled: “The occupation of Ottawa: a timeline.” The article indicates it may have been updated on February 24, 2022. This article can be accessed at the following link: <https://ottawacitizen.com/news/local-news/the-occupation-of-ottawa-a-timeline> and a print-out of the article is attached as **Exhibit GGGGG** to this affidavit.

113. On February 19, 2022, Prime Minister Trudeau released a statement titled: “Prime Minister Justin Trudeau convenes the seventh Incident Response Group meeting on the illegal blockade and occupations”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/19/prime-minister-justin-trudeau-convenes-seventh-incident-response-group> and a print-out of the statement is attached to this affidavit as **Exhibit HHHHH**.

114. On or about February 19, 2022, CBC News posted an article titled: “The Ottawa convoy has ‘shattered norms’ for protest in Canada. Will we see more of it?” and indicates that it was last updated on the same day. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/trucker-freedom-convoy-new-normal-1.6355574> and a print-out of the article is attached as **Exhibit IIIII** to this affidavit.

115. On February 19 2022, the RCMP (B.C.) released four statements:

- a. “Update: Law enforcement activity continues near the Pacific Highway Border Crossing”, which can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73550>
- b. “Update – Pacific Highway Border Crossing”, which can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73551>
- c. “Update: Police investigating after members of the media swarmed by protesters in Surrey” which can be accessed at the following link: <https://surrey.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2126&languageId=1&contentId=73553>

- d. “Update: Protesters depart and roads re-open near the Pacific Highway Border Crossing” which can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73554>

Print-outs of the above four statements are attached to this affidavit as **Exhibit JJJJJ**.

116. On February 20, 2022, Prime Minister Trudeau released a statement titled: “Prime Minister Justin Trudeau convenes the eighth Incident Response Group meeting on the illegal blockade and occupations”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/20/prime-minister-just-in-trudeau-convenes-eighth-incident-response-group> and a print-out of the statement is attached to this affidavit as **Exhibit KKKKK**.

117. On or about February 20, 2022, Global News posted an article titled: “Letter shows Alberta asked for feds’ help with Coutts blockade as Kenney claims province had resources”. The article indicates that it was last updated on February 21, 2022. This article can be accessed at the following link: <https://globalnews.ca/news/8634427/letter-alberta-asked-federal-help-coutts-illegal-blockade-sources/> and a print-out of the article is attached as **Exhibit LLLLL** to this affidavit.

118. On or about February 20, 2022, CTV News Ottawa posted an article titled: “False reports of woman’s death at Ottawa protest example of misinformation, say police”, and it indicates that it was updated the same day. This article can be assessed at the following link: <https://ottawa.ctvnews.ca/false-reports-of-woman-s-death-at-ottawa-protest-example-of-misinformation-say-police-1.5788873> and a print-out of the article is attached as **Exhibit MMMMM** to this affidavit.

119. On February 21, 2022, Ottawa Police Service released a statement titled: “Update on Police Operations to Remove Unlawful Protesters”. The statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=3&newsId=8df7ae35-59ae-469a-a7e0-5a049ef87b46> and a print-out of the statement is attached to this affidavit as **Exhibit NNNNN**.

120. On February 22, 2022, Ottawa Police Service released a statement titled: “Sparks St. Now Open to Pedestrians – Secure Area Further Reduced”. The statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=2&newsId=ba37e4b9-93f4-42ed-a992-ba9a52929d53> and a print-out of the statement is attached to this affidavit as **Exhibit OOOOO**.

121. On February 23, 2022, the RCMP released two national statements:

- a. “Revocation of the Emergencies Act”, <https://www.rcmp-grc.gc.ca/en/news/2022/revocation-the-emergencies-act>

- b. “Enforcement under the Emergencies Act – Unfreezing of accounts”,
<https://www.rcmp-grc.gc.ca/en/news/2022/enforcement-the-emergencies-act-unfreezing-accounts>

Print-outs of the above statements are attached to this affidavit as **Exhibit PFFFF**.

122. On or about March 19, 2022, Toronto Star posted an article titled: “Was it really about vaccine mandates – or something darker? The inside story of the convoy protests”. As of March 30, 2022, the article indicates it was last updated “6 days ago”.

This article can be accessed at the following link:

<https://www.thestar.com/news/canada/2022/03/19/was-it-really-about-vaccine-mandates-or-something-darker-the-inside-story-of-the-convoy-protests.html> and a print-out of the article is attached as **Exhibit QQQQQ** to this affidavit.

Other “Freedom Convoy” Court Proceedings

Li, et al. v Barber, et al., CV-22-00088514-00CP

123. On February 4, 2022, Zexi Li commenced a proposed class action against various defendants, including those identified as organizers of the “Freedom Convoy”.

The original Statement of Claim in this proceeding can be accessed at the following link: <https://www.truckerrelease.ca/claim.pdf>. A copy of the Claim is attached as

Exhibit LLLLL to this affidavit. The website: www.truckerrelease.ca also has a link to the Fresh as Amended Statement of Claim, although it does not appear that this has been issued as of yet. The Fresh as Amended Statement of Claim can be accessed at the following link: <https://www.truckerrelease.ca/claim-amended.pdf>. A copy of this claim is attached as **Exhibit RRRRR** to this affidavit.

124. On February 7, 2022, the Honourable Justice McLean issued an order for an interlocutory injunction, which is referenced above at paragraph 57 and attached as Exhibit BBB to this affidavit.

125. On or about February 15, 2022, the plaintiff in this action served and filed a motion record for a Motion for Interlocutory Injunction returnable February 16, 2022. Attached as **Exhibit SSSSS** is a copy of the Plaintiff's motion record dated February 15, 2022, omitting the cases which were included in the record.

126. On February 17, 2022, the plaintiff in this action brought an *ex parte* Mareva injunction. Reasons for the decision were delivered on February 22, 2022 and reported as [2022 ONSC 1176](#). A copy of the Reasons are attached as **Exhibit TTTTT** to this affidavit. A further endorsement was released on February 28, 2022 and reported as [2022 ONSC 1351](#). A copy of this Endorsement is attached as **Exhibit UUUUU** to this affidavit.

127. On March 9, 2022, further motions were heard in this proceeding relating to (but not limited to) motions to amend, motions relating to the Mareva Injunction and motions from banks. The Endorsement to these motions was released March 10, 2022 and reported as [2022 ONSC 1543](#). A copy of this Endorsement is attached as **Exhibit VVVVV** to this affidavit.

The Corporation of the City of Windsor v Persons Unknown, CV-22-00030791-0000

128. On February 18, 2022, the Ontario Superior Court of Justice heard a motion by the City of Windsor for injunctive relief, amongst other things. Reasons were released on February 22, 2022, and the case is reported as [2022 ONSC 1168](#). A copy of the decision is attached as **Exhibit WWWW** to this affidavit.

City of Ottawa v Persons Unknown, CV-22-88569

129. On February 14, 2022, an ex-parte motion for an Interim Injunction was brought by the City of Ottawa. The Attorney General of Canada (AGC) filed a motion record for leave to intervene on February 14, 2022. A copy of the AGC's Motion Record dated February 14, 2022 is attached as **Exhibit XXXXX** to this affidavit.

130. On February 15, 2022, the City of Ottawa released a statement titled: "City granted injunction to address disregard for municipal by-laws". The statement can be accessed at the following link: <https://ottawa.ca/en/news/city-granted-injunction-address-disregard-municipal-laws>. A print-out of the statement is attached to this affidavit as **Exhibit YYYYY**. The Order issued in that injunction can be accessed at the following link: https://documents.ottawa.ca/sites/documents/files/Feb_15_Issued_Intervenor_Order_CV-22-88569.pdf and a copy is attached to this affidavit as **Exhibit ZZZZZ**. Reasons for the decision in this motion were released on February 22, 2022 and is attached as **Exhibit AAAAAA** to this affidavit.

131. I make this affidavit to provide background context for the matters considered in Federal Court File Nos. T-306-22, T-316-22, T-347-22 and T-382-22 and for no further or other purpose.

SWORN before me through video-conferencing from the City of Toronto to the City of Oshawa in the in the Province of Ontario on April 4, 2022



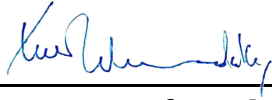
Commissioner for Taking Affidavits
Nur Muhammed-Ally, Counsel



Rebecca Coleman

This is Exhibit “A” mentioned to
and referred to in the affidavit of
Rebecca Coleman

Sworn before me this 4th day of
April, 2022.

A handwritten signature in blue ink, appearing to read "Nur Muhammed-Ally", is written over a horizontal line.

A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



Government
of Canada

Gouvernement
du Canada

[Canada.ca](#) > [Public Health Agency of Canada](#)

Government of Canada announces adjustments to Canada's border measures

From: [Public Health Agency of Canada](#)

Latest border and travel measures

This news release may not reflect the current border and travel measures. Check [COVID-19: Travel, testing and borders](#) for the latest requirements to enter Canada.

News release

November 19, 2021 | Ottawa, ON | Public Health Agency of Canada

COVID-19 testing and vaccine requirements, as well as other border measures, are an important part of Canada's response to the COVID-19 pandemic and serve to protect the health and safety of all Canadians. With vaccination rates increasing around the world, and an evolving epidemiological situation, it is important that Canada's border measures reflect the current global context.

Today, the Government of Canada is announcing upcoming adjustments to Canada's border measures.

Effective November 30, 2021, fully vaccinated individuals with right of entry to Canada who depart and re-enter the country within 72 hours of leaving Canada will not have to present a pre-entry molecular test. This exemption is only for trips originating in Canada taken by fully vaccinated Canadian citizens, permanent residents or individuals registered under the Indian Act, who depart and re-enter by land or by air and can demonstrate that they have been away from Canada for less than 72 hours. This exemption extends to accompanying children under 12, and individuals with medical contraindications to vaccination. Also effective November 30, 2021, Canada will expand the list of COVID-19 vaccines that travellers can receive to be considered fully vaccinated for the purpose of travel to Canada. The list will include Sinopharm, Sinovac and COVAXIN, matching the World Health Organization Emergency Use Listing.

The Government of Canada is also announcing that as of January 15, 2022, certain groups of travellers, who are currently exempt from entry requirements, will only be allowed to enter the country if they are fully vaccinated with one of the vaccines approved for entry into Canada. These groups include:

- individuals travelling to reunite with family (unvaccinated children under 18 years of age will retain exemption if travelling to reunite with an immediate or extended family member who is a Canadian, permanent resident, or person registered under the *Indian Act*);
- international students who are 18 years old and older;
- professional and amateur athletes;

- individuals with a valid work permit, including temporary foreign workers (outside of those in agriculture and food processing); and
- essential service providers, including truck drivers.

After January 15, 2022, unvaccinated or partially vaccinated foreign nationals will only be allowed to enter Canada if they meet the criteria for limited exceptions, which apply to certain groups such as agricultural and food processing workers, marine crew members, those entering on compassionate grounds, new permanent residents, resettling refugees and some children under the age of 18. Exempt unvaccinated travellers will continue to be subject to testing, quarantine, and other entry requirements. Non-exempt unvaccinated or partially vaccinated foreign nationals will be prohibited entry into Canada.

Starting November 30, vaccination will be required for travel within and out of Canada. A valid COVID-19 molecular test will no longer be accepted as an alternative to vaccination unless travellers are eligible for one of the limited exemptions, such as a medical inability to be vaccinated. Travellers should contact their airline or railway company to obtain the necessary form and submit it in accordance with their carrier's approval process as of November 30.

The Government of Canada's response to the COVID-19 pandemic will continue to prioritize the health and safety of Canadians. As vaccination levels, case counts and hospitalization rates evolve, the Government of Canada will continue to consider further targeted measures at the borders—and when to lift or adjust them—to keep Canadians safe.

Quotes

“Health and safety will always remain at the forefront of any decision our government makes in the fight against COVID-19. The upcoming changes to Canada’s border testing and entry requirements reflect the next stage in our government’s approach as we align with the improving vaccination rates both here in Canada and around the world. The situation at our borders remains closely monitored, with officials and experts continuing their work to evaluate the measures in place and recommend necessary adjustments as required.”

The Honourable Jean-Yves Duclos
Minister of Health

“From the start of the pandemic our goal has been to protect the health and safety of Canadians and prevent the spread of COVID-19 through our borders. Our commitment to border security has helped keep Canadians safe, and as the situation continues to evolve and we open our borders to non-essential travel, we will continue to ensure that travellers meet all of the requirements for entry to Canada.”

The Honourable Marco E. L. Mendicino
Minister of Public Safety

"As we restart many aspects of our economy, including travel, vaccination will continue to play an important role in keeping each other and our transportation systems safe and secure. No matter the final destination, ensuring travellers are vaccinated against COVID-19 protects travellers and transportation workers."

The Honourable Omar Alghabra
Minister of Transport

"Requiring foreign nationals to be fully vaccinated adds another important layer of protection at the border. Many foreign nationals and international students arriving in Canada are already fully vaccinated, and the measures announced today will help ensure that Canadians remain protected against COVID-19 as the economy reopens and international travel returns."

The Honourable Sean Fraser
Minister of Immigration, Refugees and Citizenship

Quick facts

- Travellers should check if they are eligible to enter Canada and meet all entry requirements before heading to the border. In addition, some provinces and territories may have their own entry restrictions in place. Check and follow **both** the federal and any provincial or territorial restrictions and requirements before travelling.

- All travellers, regardless of how long they were away from Canada, continue to be required to submit their mandatory information via ArriveCAN (free mobile app or website), including proof of vaccination in English or French and a quarantine plan prior to arriving in Canada.
- For trips out of the country longer than 72 hours, all travellers eligible to enter Canada must complete the mandatory pre-entry molecular COVID-19 test. Antigen tests are **not** accepted.
- The Government of Canada will continue to make appropriate adjustments to border measures, and will consider further changes to the pre-entry test requirement for vaccinated Americans and others in subsequent phases.
- To continue improving the processing of travellers, the Canada Border Services Agency (CBSA) has launched a new feature in ArriveCAN called Advance CBSA Declaration. This feature will allow travellers arriving at certain airports to electronically submit their customs and immigration declaration in advance of their arrival in Canada. This feature is currently available for travellers arriving at Vancouver International Airport through the ArriveCAN website only. It will soon be launched at other airports across Canada.
- Travellers can use a proof of vaccination credential issued by their province or territory, the local health facility where their vaccinations have been recorded, or from their

country of vaccination, as long as it is a COVID-19 vaccine approved by the Government of Canada for the purpose of travel. Where available, Canadians are strongly encouraged to use the [Canadian COVID-19 proof of vaccination](#).

- Transport Canada continues to work with the cruise ship industry, and other domestic and international partners, to permit the safe re-opening of Canada to cruise ship travel in spring 2022, including the specific vaccination requirements for cruise ship passengers, and other health protocols. Additional information will be available in the coming weeks.
- The Government of Canada is looking into next steps in reopening additional Canadian airports to receive international passenger flights. Transport Canada is working closely with CBSA, PHAC, and airport partners to determine when and which airports can be reopened.

Related products

- [Backgrounder - Adjustments to Canada's border and travel measures](#)

Associated links

- [COVID-19: Travel, testing and borders](#)
- [COVID-19: Vaccinated travellers entering Canada](#)

- [ArriveCAN](#)
- [COVID-19: Summary data about travellers, testing and compliance](#)
- [COVID-19: Boarding flights and trains in Canada](#)

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Search for related information by keyword: [HE Health and Safety](#) | [Public Health Agency of Canada](#) | [Transport Canada](#) | [Public Safety Canada](#) | [Canada Border Services Agency](#) | [Immigration, Refugees and Citizenship Canada](#) | [Global Affairs Canada](#) | [Health Canada](#) | [Belarus](#) | [Philippines](#) | [Uganda](#) | [Armenia](#) | [Trinidad and Tobago](#) | [Syria](#) | [Panama](#) | [Saint Lucia](#) | [Austria](#) | [Antarctica](#) | [Turks and Caicos Islands](#) | [France](#) | [United States](#) | [Ukraine](#) | [Guam](#) | [Brunei Darussalam](#) | [Niue](#) | [India](#) | [Republic of Korea \(South Korea\)](#) | [Dominican Republic](#) | [Germany](#) | [Spain](#) | [Monaco](#) | [São Tomé and Príncipe](#) | [Paraguay](#) | [Costa Rica](#) | [Switzerland](#) | [Belize](#) | [Bermuda](#) | [Denmark](#) | [French Guiana](#) | [Sint Maarten](#) | [Iceland](#) | [Bhutan](#) | [Côte d'Ivoire](#) | [Colombia](#) | [Sudan](#) | [Cyprus](#) | [Falkland Islands](#) | [Myanmar](#) | [Tajikistan](#) | [Benin](#) | [Ireland](#) | [Gabon](#) | [Romania](#) | [Democratic People's Republic of Korea \(North Korea\)](#) | [North Macedonia](#) | [Samoa](#) | [Azerbaijan](#) | [Gibraltar](#) | [Guadeloupe](#) | [Peru](#) | [Chile](#) | [Kazakhstan](#) | [Pakistan](#) | [Central African Republic](#) | [Laos](#) | [Italy](#) | [Iraq](#) | [Belgium](#) | [Seychelles](#) | [Slovakia](#) | [Saint Martin](#) | [Malawi](#) | [Nauru](#) | [Tuvalu](#) | [British Virgin Islands](#) | [Ghana](#) | [Solomon Islands](#) | [Indonesia](#) | [Suriname](#) | [Cambodia](#) | [Djibouti](#) | [Australia](#) | [Algeria](#) | [Singapore](#) | [Uruguay](#) | [Martinique](#) | [Cook Islands](#) | [Lebanon](#) | [Portugal](#) | [Macao](#) | [Latvia](#) | [Antigua and Barbuda](#) | [Fiji](#) | [Sierra Leone](#) | [Bonaire](#) | [Finland](#) | [South Sudan](#) | [Kyrgyzstan](#) | [Uzbekistan](#) | [Vanuatu](#) | [Azores](#) | [Sri Lanka](#) | [Haiti](#) | [San Marino](#) | [Turkmenistan](#) | [Chad](#)

| [Angola](#) | [Saint Vincent & the Grenadines](#) | [Estonia](#) | [Cabo Verde](#) | [Tunisia](#) | [Anguilla](#) | [South Africa](#) | [China](#) | [Puerto Rico](#) | [Poland](#) | [Montenegro](#) | [Moldova](#) | [Jordan](#) | [Guinea-Bissau](#) | [Japan](#) | [Albania](#) | [Mozambique](#) | [Guatemala](#) | [Andorra](#) | [Ecuador](#) | [Bolivia](#) | [Norway](#) | [Equatorial Guinea](#) | [Luxembourg](#) | [United Arab Emirates](#) | [Papua New Guinea](#) | [Guyana](#) | [Aruba](#) | [Curaçao](#) | [Saint-Barthélemy](#) | [Barbados](#) | [American Samoa](#) | [Botswana](#) | [Saudi Arabia](#) | [Kuwait](#) | [Oman](#) | [Serbia](#) | [Cameroon](#) | [Republic of Congo](#) | [Northern Mariana Islands](#) | [Kenya](#) | [Malaysia](#) | [Mongolia](#) | [Palau](#) | [Lesotho](#) | [Iran](#) | [Togo](#) | [Saint-Pierre-et-Miquelon](#) | [Madagascar](#) | [Burkina Faso](#) | [Canary Islands](#) | [Timor-Leste](#) | [Micronesia](#) | [Kosovo](#) | [Taiwan](#) | [Canada](#) | [Turkey](#) | [Ethiopia](#) | [New Caledonia](#) | [Czech Republic](#) | [Tanzania](#) | [Réunion](#) | [Libya](#) | [Mauritania](#) | [Dominica](#) | [Kiribati](#) | [Rwanda](#) | [US Virgin Islands](#) | [Sweden](#) | [Netherlands](#) | [Thailand](#) | [Somalia](#) | [Democratic Republic of the Congo](#) | [Yemen](#) | [Hong Kong](#) | [Mayotte](#) | [Jamaica](#) | [United Kingdom](#) | [Venezuela](#) | [Egypt](#) | [Marshall Islands](#) | [México](#) | [Bulgaria](#) | [Comoros](#) | [Grenada](#) | [Eritrea](#) | [Vietnam](#) | [Burundi](#) | [Namibia](#) | [Senegal](#) | [Georgia](#) | [Montserrat](#) | [Croatia](#) | [Gambia](#) | [Nicaragua](#) | [Zimbabwe](#) | [Bahrain](#) | [Russia](#) | [Mali](#) | [Morocco](#) | [Tokelau](#) | [Brazil](#) | [Greenland](#) | [Cuba](#) | [Nepal](#) | [Greece](#) | [Hungary](#) | [Liechtenstein](#) | [Lithuania](#) | [Guinea](#) | [Saint Kitts and Nevis](#) | [Israel](#) | [Afghanistan](#) | [Bosnia and Herzegovina](#) | [Slovenia](#) | [Liberia](#) | [Mauritius](#) | [Nigeria](#) | [Tonga](#) | [Argentina](#) | [Zambia](#) | [New Zealand](#) | [Qatar](#) | [Maldives](#) | [West Bank and the Gaza Strip](#) | [Bahamas](#) | [El Salvador](#) | [Niger](#) | [Malta](#) | [Bangladesh](#) | [Honduras](#) | [Cayman Islands](#) | [Eswatini](#) | [French Polynesia](#) | [Coronavirus \(COVID-19\)](#) | [Travel and tourism](#) | [general public](#) |

[news releases](#) | [Hon. Sean Fraser](#) | [Hon. Jean-Yves Duclos](#) |
[Hon. Marco E. L. Mendicino](#) | [Hon. Omar Alghabra](#)

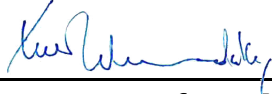
Date modified:

2021-11-19

This is Exhibit “C” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this **4th** day of
April, 20**22**.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

Introduction to The Memorandum of Understanding (MOU)

CALL TO ACTION:

"All that tyranny needs to gain a foothold is for people of good conscience to remain silent."

Thomas Jefferson

Dear Canadian Citizens, Indigenous Communities, and Permanent Residents:

Thank you for choosing to take part in this unprecedented Nationwide movement. Canada Unity represents and defends a coalition of **Concerned Canadian Citizens, Permanent Residents, Indigenous Communities, Employers, Employees from private and government bodies, Institutions and Businesses at large**. The bond we have in common is that we stand opposed to the current unlawful restrictions and discriminatory SARS-CoV-2 (and not limited to SARS-CoV-2 subsequent variations) mandates.

The key to ending the current spike in discrimination and segregation issues impacting millions of Canadians resides within this attached "Memorandum of Understanding" or MOU. Few of us may be familiar with what this document is. To briefly summarize, an MOU is a document describing the broad outlines of an agreement that two or more parties have reached.

In this case the parties are "THE PEOPLE OF CANADA", the "SENATE OF CANADA", and "THE GOVERNOR GENERAL OF CANADA", the highest authorities representing the Federal Government. The matter to be discussed and agreed upon is this; The Senate of Canada and the Governor General, combined referred to as the Federal Government are to uphold and enforce all Canadian and International Human Rights Laws that are clearly laid out in the MOU or "RESIGN their lawful positions of authority Immediately".

By having the Senate of Canada and the Governor General of Canada sign this MOU into action, they agree to immediately cease and desist all unconstitutional, discriminatory and segregating actions and human rights violations. It calls for an immediate instruction to all levels of the Federal, Provincial, Territorial and Municipal governments to not only stop but furthermore waive all SARS-CoV-2 (and not limited to SARS-CoV-2 subsequent variations) fines that have been issued and imposed upon its citizens, institutions, and private enterprises. Further, to immediately re-instate all employees in all branches of all levels of governments and not limited to promote the same to the private industry and institutional sectors employees with full lawful employment rights prior to wrongful and unlawful dismissals. Lastly it instructs all levels of government and private Sector that the Illegal use of a Vaccine Passport to cease and desist immediately.

What can I do as a Canadian?

You can be a hero; you can stand for truth and justice today with hardly any effort. Please take the time to read the attached MOU. If you believe in what Canada Unity is doing, add your signature and your voice to this document before it heads to Ottawa. Let the Senate of Canada and The Governor General of Canada know that you are aware of your Human Rights and that you are demanding they be upheld and enforced. You are not just standing for yourself by doing this. You are standing up for everyone you know and even those you will never meet. By signing, you are saying you want the Law to be returned to Ottawa!!

Let us make history in Unity, we trust and thank you for your commitment and undivided support.

Respectfully,

From the Desk of Canada Unity

MEMORANDUM of UNDERSTANDING

This Memorandum of Understanding (the “Memorandum”) is made this ____ day of _____ 2021, duly signed at place, Ottawa by and between the Parties;

Concerned Canadian Citizens, Indigenous Communities, and Permanent Residents, which includes Employers, Employees from private and government bodies, Institutions and Businesses at large represented by; Canada Unity, located in Calgary, Alberta, Canada and further represented by; Mr. and Ms. James and Sandra Bauder, Citizens of Canada and Mr. Martin Brodmann, Citizen of Canada;

and,

The Senate of Canada comprised of; The Present 105 Honorable Senators, located in Ottawa, Canada, represented by; the present Honorable George J. Furey, QC-Speaker of the Senate and not limited to present sworn in sitting Honorable Senators and representative Speaker of the Senate;

and,

The Governor General of Canada Her Excellency the Right Honourable Mary May Simon representing The Queen in Canada;

and by endorsement of,

The Senate of Canada represented by; Honorable George J. Furey, QC-Speaker of the Senate and **The Governor General of Canada** Her Excellency the Right Honourable Mary May Simon, the highest authorities representing the Federal Government, herein further referred to as “The Government of Canada” who endorses this “Initiative” and the purpose of achieving the various aims and objectives relating to the no mandatory vaccine, no vaccine passport, no discrimination, no fine regulations / programs and no segregation initiatives et al on Private and Government bodies, institutions et al citizens and people and or entities et al (the “Initiative”), separate attached referenced documents are part of this “Memorandum” and named Schedules A,B,C,D,E,F,G,H,I,J,K,L, as specified on page 6 of this document and will be made available to the committee once formed.

WHEREAS: The Parties desire to enter into the formula in which each Party appoints an “Entity” representing their interests and these Entities are commissioned to work together to complete the “Initiative”;

AND WHEREAS: The Parties desire to enter into a “Memorandum” between them, setting out the working arrangements and the general directives for each of the appointed “Entities” as necessary to complete the “Initiative”.

ARTICLE 1. SCOPE of ACCORD

Canada Unity (CU) offers this “Memorandum” to the Senate of Canada and the Governor General of Canada, the highest authorities representing the Federal Government (SCGGC) as “The Government of Canada”. Acceptance by endorsement of this “Memorandum” and its valuable considerations, will solidify our mutual accord as further detailed in the understanding.

ARTICLE 2. OBLIGATION and COOPERATION

The appointed “Entities” agree to work together in the true spirit of partnership to ensure there is a united, visible, and responsive leadership of the “Initiative” and to demonstrate fair practice according to the Canadian Constitution, Canadian Charter of Rights and Freedoms, and Privacy Act and as further described in Article 3.d. of this “Memorandum” administrative and managerial commitment to the “Initiative”.

ARTICLE 3. MANDATE

- a. CU & SCGGC agree to form a committee, called the Citizens of Canada Committee (CCC).
- b. SCGGC undertakes and appoints authorized (CCC) representatives.
- c. CU undertakes and appoints authorized (CCC) representatives.
- d. CU & SCGGC adopts and adheres to The Government of Canada’s agreements on transparency in matters related to the Canadian Federal Referendum Act, Canadian Constitution, Canadian Charter of Rights and Freedoms, Access to Information Act and the Privacy Act, Canadian Human Rights Act, Canadian Bill of Rights, National Security Act 2017, Crimes Against Humanity and War Crimes Act, Tri Council Policy Statement, National and International Human Rights Declarations and such Regulations et al, the Nuremberg Code, the Declaration of Helsinki all as provided by law, and not only limited to latest additions, addendums and revisions; and to be precise including laws, regulations and declarations prior to SARS-CoV-2, and any subsequent variations of SARS-CoV-2.
- e. SCGGC will effective as of midnight on this ___, day of _____, 2021 instruct all levels of the Federal, Provincial, Territorial, and Municipal governments to immediately cease and desist all unconstitutional human rights, discriminatory and segregated actions, and not limited to, immediately instruct all levels of the Federal, Provincial, Territorial and Municipal governments to not only stop, but furthermore waive all SARS-CoV-2 (and not limited to SARS-CoV-2 subsequent variations) fines that have been issued and imposed upon its citizens, institutions, and private enterprises.
- f. SCGGC will effective as of midnight on this ___, day of _____, 2021, instruct all levels of the Federal, Provincial, Territorial, and Municipal governments to re-instate all employees in all branches of governments and, not limited to promote the same to the private industry and institutional sectors employees with full lawful employment rights prior to the wrongful and unlawful dismissals that stem from the SARS-CoV-2 (and not limited to SARS-CoV-2 subsequent variations) vaccine passport mandates.

- g. SCGGC will effective as of midnight on this ___, day of ___, 2021, issue a cease-and-desist order abolishing all Federal, Provincial, Territorial, and Municipal Vaccine Passport requirements, Vaccine discriminatory regulations, initiatives, and mandates in regard to SARS-CoV-2 (and not limited to SARS-CoV-2 subsequent variations).
- h. Further, SCGGC will effective as of midnight on this ___, day of ___, 2021, issue a cease-and-desist order to the respected Honorable Members of the Government of Canada with the consequent instructions to further instruct the Premiers of the Provinces and Territories, the Mayors of the respected Municipalities and, the respected Federal, Provincial, Territorial, and Municipal Medical Officers to stop all such unlawful activities pursuant to **ARTICLE 3. MANDATE** section d. of this “Memorandum.”
- i. Canada is a lawful member of the Helsinki Declaration to name one but not limited to additional Canadian and International Human Rights Laws and Regulations et al and therefore enacts its duty and responsibility to make any and all laws and regulations available to its citizens; further, to enforce and uphold such laws, regulations, and declaration(s) on behalf of its Citizens of Canada.
- j. By signing this “Memorandum”, CU will immediately stop “Operation Bear Hug Ottawa”, demonstration / convoy and Federal Referendum activities and will strive to work with all groups and entities et al to bring this country together in unity.
- k. CU & SCGGC agree to have the CCC committee formed within 10 days of acceptance and signing of this “Memorandum”.
- l. CU & SCGGC agree to have a final “signed” and publicly released agreement in place within “no later than 90 days” of acceptance and signing of this “Memorandum”.
- m. CU & SCGGC agree to only release jointly approved media / press statements on a daily basis during the time schedule specified in **ARTICLE 3. MANDATE** section paragraph k. and l.
- n. SCGGC will immediately make available all schedules as described in **ARTICLE 3. MANDATE** section paragraph d. available to the CCC committee.

ARTICLE 4. PROVISIONS OF ENGAGEMENT

- a. CU has no political or corporate affiliations or influences. CU, the Representative of The People of Canada for human rights violations, discriminatory actions violations and not limited to segregation actions and violations.
- b. CU is not an anti-vaccine organization; CU stands for lawful freedom of personal choice with no discrimination, discriminatory actions, united segregation campaigns, referendums, laws and / or regulations et al.
- c. SCGGC will represent itself as The Government of Canada as a whole and not party related.

ARTICLE 5. TERM

The arrangements made by the Parties to this “Memorandum” shall remain imbedded in this document and shall remain in full force to the date a final agreement is reached and duly signed.

ARTICLE 6. GOVERNING LAW

This Memorandum shall be construed in accordance with the Laws of Canada and the International Human Rights Commissions.

ARTICLE 7. SUSPENDED PROVISIONS

This Memorandum constitutes the entire “Memorandum” between the Parties relating to this subject matter and supersedes all prior or simultaneous representations, discussions, or negotiations, whether written or oral unless attached to this Memorandum.

ARTICLE 8. FINAL PROVISIONS

CU & SCGGC will be responsible to cooperate in good faith by upholding matters pertinent and relevant to the substantive efforts required by all Parties to this “Initiative” going forward.

Terms and Conditions have been reached by the Parties to this “Memorandum” and collectively hereby attest to these provisions and supporting attachments by the authorised signature endorsement of this “Memorandum” on the date and place first written above.

Three original documents, to be held on file for future reference of this “Memorandum” has been sent; one to The United Nations Human Rights Council (UNHRC) to the attention of President Nazahat Shameen Khan; one to the Office of the High Commissioner for Human Rights, commonly known as the Office of the High Commissioner for Human Rights (OHCHR) or the United Nations Human Rights Office to the attention of the High Commissioner Michelle Bachelet of Chile ; both organizations ' headquarters located in Geneva Switzerland; and one to the Canadian Human Rights Commission to the attention of Chief Commissioner Marie-Claude Landry, AD.E. located in Ottawa, Canada.

This “Memorandum” shall be deemed as a lawful binding document, not only when executed by way of signature of all parties, but furthermore, shall be deemed as a National and International court admissible, evidence-based document, by way of electronic endorsed and acceptance by its Canadian Citizens, Indigenous Communities, and Permanent Residents as attached hereto.

Remaining of page left blank intentionally

Signed in Full Agreement of this of this “Memorandum” on this ____, day of _____, 2021.

Authorized Signatory;

Representative of Canada Unity

Mr. James Bauder

Witness; _____

Authorized Signatory;

Representative of Canada Unity

Ms. Sandra Bauder

Witness; _____

Authorized Signatory;

Representative of Canada Unity

Mr. Martin Brodmann

Witness; _____

Authorized Signatory;

The Senate of Canada, Speaker of the Senate

Honorable George J. Furey

Witness; _____

Authorized Signatory;

Governor General of Canada

Her Excellency, the Right Honourable Mary May Simon

Witness; _____

Schedule A

Canadian Federal Referendum Act of Canadian Citizens and Permanent Residents

Schedule B

Canadian Constitution

Schedule C

Access to Information Act and the Privacy Act

Schedule D

National & International Human Rights Declarations and Regulations

Schedule E

The Nuremberg Code

Schedule F

WMA Declaration of Helsinki-Ethical Principles for Medical
Research Involving Human Subjects

Schedule G

Tri Council Policy Statement: Ethical Conduct for Research Involving
Humans; as provided by Law

Schedule H

Canadian Human Rights Act

Schedule I

Canadian Bill of Rights

Schedule J

National Security Act
2017

Schedule K

Crimes Against Humanity and War Crimes Act (S.C. 2000, c. 24)

Schedule L

Endorsement and Signature Pages of The People of Canada

Version MOU Français

APPEL À L'ACTION.

“All that tyranny needs to gain a foothold is for people of good conscience to remain silent.”

- *Thomas Jefferson*

CHERS CITOYENS CANADIENS, COMMUNAUTÉS AUTOCHTONES ET RÉSIDENTS PERMANENTS,

Merci d'avoir choisi de participer à ce mouvement national sans précédent. Canada Unity représente et défend un groupe de gens conscientisés : citoyens canadiens, résidents permanents, provenant de communautés autochtones, employeurs, employés gouvernementaux et travailleurs d'entreprises de tout genre. Le lien qui nous unit tous est notre opposition aux restrictions illégales actuelles et aux mandats discriminatoires du SARS-COV-2 et de tous ses variants.

La clé pour mettre fin à la flambée actuelle des problèmes de discrimination et d'isolement qui touchent des millions de Canadiens est le protocole d'entente ci-joint. Peu d'entre nous sont familiers avec ce type de document. Pour résumer brièvement, un protocole d'entente est un contrat de gouvernance dans lequel deux parties ou plus conviennent d'entamer des négociations.

Dans ce cas, les parties sont « LE PEUPLE DU CANADA », le « SÉNAT DU CANADA » et le DIRECTEUR GÉNÉRAL DU CANADA. Le sujet à débattre et à résoudre est le suivant : Le gouvernement fédéral et le gouverneur général doivent faire respecter et appliquer toutes les lois canadiennes et internationales sur les droits de la personne qui sont clairement énoncées dans le protocole d'entente ou « DÉMISSIONNER » immédiatement de leurs positions légitimes d'autorité.

En faisant signer ce protocole d'entente par le Sénat fédéral et le gouverneur général, ils acceptent de se soustraire immédiatement à toute violation consensuelle des droits de la personne commise par la discrimination et la ségrégation. Il exige que tous les niveaux des gouvernements fédéraux, provinciaux et municipaux non seulement cessent, mais annulent également toutes les amendes reliées au SRAS-COV-2 et de tous ses variants qui ont été imposées à ses citoyens, ainsi qu'aux entreprises privées. En outre, réintégrer immédiatement tous les employés du gouvernement licenciés de façon injustifiées et illégales en raison des mesures sanitaires et interdire à tout autres employeurs, peu importe leurs secteurs d'activités, d'imposer des licenciements injustifiés et illégaux à leurs employés ayant des droits légaux. Finalement, il indique à tous les ordres de gouvernement du secteur privé que l'utilisation nocive d'un passeport vaccinal en sol canadien doit cesser immédiatement peu importe l'endroit.

QUE PUIS-JE FAIRE EN TANT QUE CANADIEN?

Vous pouvez être un héros. Vous pouvez défendre la vérité et la justice sans grand effort. Veuillez prendre le temps de lire le protocole d'entente ci-joint. Si vous croyez en ce que fait Canada Unity, ajoutez votre signature et votre voix à ce document avant qu'il ne se rende à Ottawa. Faites savoir au Sénat fédéral que vous êtes conscients de vos droits de la personne et que vous exigez qu'ils soient respectés et appliqués. En participant, vous le faites non seulement pour vous, mais pour tous les Canadiens. En signant, vous dites que vous voulez que la loi soit restaurée à Ottawa !!

Passons à l'histoire en nous unissant. Nous avons confiance en vous et nous vous remercions pour votre engagement et votre soutien.

Respectueusement,

Canada Unity

Le présent « protocole d'entente » (le « mémorandum ») est fait en ce _____ de 2021, dûment signé sur place, à Ottawa entre les parties :

Citoyens canadiens et résidents permanents concernés, communautés autochtones, employés, employeurs d'organismes privés et gouvernementaux, institutions et entreprises en général représentés par; Canada Unity, situé à Calgary, Alberta, Canada et représenté par; M. et Mme James et Sandra Bauder, Citoyens du Canada & M. Martin Brodmann Citoyen du Canada.

Et,

Le Sénat du Canada représenté par: Les 105 sénateurs actuels, situés à Ottawa, au Canada, sont représentés par; L'honorable George J. Furey, président du Sénat québécois et ne se limite pas aux honorables sénateurs qui siègent en ce moment.

Et,

Le gouverneur général du Canada, représenté par Son Excellence, la très honorable Mary May Simon.

Et par l'approbation de :

Le Sénat du Canada représenté par L'honorable George J. Furey et le gouverneur du Canada représenté par Son Excellence la très honorable Mary May Simon, les plus hautes autorités représentant le gouvernement canadien qui appuie cette initiative et dont le but est d'obtenir l'annulation de toutes les mesures sanitaires : passeports vaccinales, amendes et autres initiatives de ségrégation et autres sur les entreprises institutions privées et gouvernementales et aux citoyens et personnes mentionnées . Les documents référencés ci-joints font partie du présent « Mémorandum » et sont nommés Annexes A, B,C, D, E, F, G, H, I, J,K comme c'est spécifié à la page 6 du présent document et seront mis à la disposition du comité une fois formé.

TANDIS QUE: Les parties souhaitent participer à cette formule dans laquelle chaque partie désigne une « Entité » représentant leurs intérêts et ces Entités sont chargées de travailler à l'achèvement de « l'Initiative ».

ET TANDIS QUE : Les parties sont désireuses de conclure un « Mémorandum » entre elles, énonçant les modalités de travail et les conditions générales nécessaires pour que chacune des « entités » désignées, le cas échéant, complète « l'Initiative ».

ARTICLE 1ER. CHAMP D'APPLICATION DE L'ACCORD

Canada Unity (CU) offre ce « Memorandum » au Sénat du Canada et au Gouverneur général du Canada (GCSC, qui représentent les plus hautes autorités du gouvernement canadien. L'acceptation par l'approbation de ce « mémorandum » et de ses précieuses considérations consolidera notre accord mutuel tel que détaillé dans l'accord.

ARTICLE 2. OBLIGATION et COOPÉRATION

Les « Entités » nommées conviennent de travailler ensemble dans un véritable esprit de partenariat pour s'assurer qu'il y a un leadership uni, visible et réceptif de « l'Initiative » et pour démontrer des pratiques équitables conformément à la Loi constitutionnelle canadienne respectant la Charte canadienne du droit à la vie privée et des libertés et tel que décrit plus en détail à l'article 3.d. du dit « Mémorandum ».

ARTICLE 3. MANDAT

- a. CU & SCGGC acceptent de former un comité, appelé comité des citoyens du Canada (CCC)
- b. SCGGC entreprend et nomme des représentants autorisés (CCC).
- c. CU entreprend et nomme des représentants autorisés (CCC).
- d. CU & SCGGC adoptent et adhèrent aux accords du gouvernement du Canada sur la transparence dans les questions liées à la Loi référendaire fédérale canadienne, à la Constitution canadienne, à la Charte canadienne des droits et libertés, à la Loi sur la confidentialité et à la Loi sur l'accès à l'information, à la Loi canadienne sur les droits de la personne, aux Déclarations nationales et internationales des droits de la personne et ces règlements, etc., le Code Nuremberg, la Déclaration de Helsinki et l'Énoncé de politique des trois Conseils, la Loi canadienne sur les droits de la personne, la Déclaration canadienne des droits, la sécurité nationale, la Loi sur les crimes contre l'humanité et les crimes de guerre, comme le prévoit la loi et sans s'y limiter, les derniers ajouts et les révisions ; et pour être précis, y compris les lois, les règlements et les rapports pré-SARS-COV-2 et tous ses variants.
- e. SCGGC, à compter de minuit ce _____ de 2021, ordonnera à tous les ordres des gouvernements fédéraux, provinciaux et municipaux de cesser immédiatement et de prévenir toute action inconstitutionnelle, discriminatoire et ségrégée des droits de la personne, et sans s'y limiter, d'ordonner immédiatement à tous les ordres de gouvernement fédéral, provincial et municipal non seulement pour arrêter, mais également d'annuler toutes les amendes sars-COV-2 et de tous ses variants qui ont été émises et imposées à ses citoyens, aux institutions et aux entreprises privées.
- f. Le SCGGC entrera en vigueur à partir de minuit ce _____ de 2021, à tous les niveaux des administrations fédérales, provinciales et municipales, réintégrant tous les employés fédéraux dans tous les gouvernements et interdisant à tout autres employeurs, peu importe leurs secteurs d'activités, d'imposer des licenciements injustifiés et illégaux à leurs employés ayant des droits légaux qui résultent du SARS-COV-2 et de ses variants en imposant le passeport vaccinal.

- g. SCGGC entrera en vigueur à compter de minuit ce _____ de 2021, émettra une ordonnance de cessation et d'abstention abolissant les exigences fédérales, provinciales et municipales relatives aux passeports vaccinaux ainsi que toute réglementation concernant le SRAS-COV-2 et de ses variants.
- h. En outre, le SCGGC entrera en vigueur à minuit ce _____ de 2021, émettra une ordonnance de cessation et d'abstention aux honorables députés du parlement fédéral avec les instructions qui en découlent pour donner des instructions supplémentaires aux premiers ministres des provinces, aux maires des municipalités et aux médecins fédéraux et provinciaux de mettre fin à toutes ces activités illégales conformément à l'article 3. Mandat de la section d. du présent « Mémoire ».
- i. Le gouvernement du Canada est un membre légitime de la Déclaration d'Helsinki, entre autres, mais pas limité à d'autres lois et règlements sur les droits de la personne au Canada et à l'international, etc., et par conséquent met son devoir et sa responsabilité de mettre toutes les lois et tous les règlements à la disposition de ses citoyens en outre pour appliquer et faire respecter ces lois, règlements et déclarations au nom de ses citoyens de Canada.
- j. En signant ce Mémoire, CU arrêtera immédiatement Opération Bear Hug Ottawa et toutes ses activités de contestation des mesures sanitaires et s'efforcera de travailler avec tous les groupes et entités concernées pour réunir ce pays dans un esprit coopératif.
- k. CU & SCGGC acceptent que le comité CCC soit formé dans les 10 jours suivant l'acceptation et la signature du présent « mémoire ».
- l. CU & SCGGC acceptent d'avoir un accord final « signé » et officiellement publié en place avant 90 jours après l'acceptation et la signature du présent « mémoire ».
- m. CU & SCGGC s'engagent à ne publier quotidiennement que des communiqués de presse approuvés conjointement pendant le calendrier spécifié à l'article 3. Section du mandat Paragraphe k & l.
- n. SCGGC mettra immédiatement à disposition tous les calendriers des « dossiers publics officiels » tels que décrits dans la section L'article 3. Mandat Paragraphe d. à la disposition du comité de la CCC.

ARTICLE 4 DISPOSITIONS D'ENGAGEMENT

- a. CU n'a pas d'affiliations ou d'influences politiques ou corporatives. CU représente le peuple du Canada pour violations des droits de l'homme et actes discriminatoires non limités aux actions de ségrégation et aux violations.
- b. CU n'est pas une organisation anti-vaccin; CU soutient la liberté légale de choisir sans discrimination et est contre toutes actions discriminatoires qui créent de la ségrégation .
- c. SCGGC représentera le gouvernement du Canada sans affiliation à un parti politique.

ARTICLE 5 DURÉE

Les dispositions prises par les parties de ce « mémorandum » restent inscrites dans le présent document et restent pleinement en vigueur jusqu'à ce que l'accord final soit conclu et signé.

ARTICLE 6 LOI APPLICABLE

Le présent mémorandum doit être interprété conformément aux lois du Canada et des Commissions internationales des droits de la personne.

ARTICLE 7 DISPOSITIONS SUSPENDUES

Le présent mémorandum constitue l'ensemble du « mémorandum » entre les parties en la matière et remplace toutes les déclarations antérieures ou simultanées, les discussions ou les négociations, écrites ou orales, à moins qu'elles ne soient jointes au présent mémorandum.

ARTICLE 8 DISPOSITIONS FINALES

CU & SCGGC, à partir de maintenant, devront coopérer de bonne foi en s'en tenant à des questions pertinentes pour encourager les efforts de fond requis par toutes les parties participant à cette « initiative » pour l'avenir.

Les parties du présent « Mémorandum » ont conclu aux modalités et aux conditions générales et, collectivement, attestent, par leurs signatures, à ces dispositions, dans les pièces jointes, du présent « Mémorandum » à la date et au lieu écrits pour la première fois ci-dessus.

Trois documents originaux devant être conservés dans les dossiers pour référence future de ce « Mémorandum » ont été envoyés : un au Conseil des droits de l'homme des Nations Unies (CDH); à l'attention du Président Nazahat Shameen Khan , un au Haut-Commissariat pour les droits humains des Nations Unies , à Michelle Bachelet, du Chili, les 2 se situant à Genève, en Suisse, et l'autre à la Commission canadienne des droits de la personne, à l'attention de la commissaire en chef Marie-Claude Landry, situé à Ottawa, au Canada.

Le présent « Mémorandum » sera considéré comme un document légal contraignant non seulement lorsqu'il est exécuté en lien avec les signatures de toutes les parties, mais sera en outre considéré comme un document fondé sur des preuves recevables par les tribunaux nationaux et internationaux par la voie de l'approbation électronique et de l'acceptation par ses citoyens canadiens, groupes indigènes et résidents permanents.

Signé en plein accord avec ce « Mémoire » ce _____ de 2021

Signataire autorisé;

Représentant Canada Unity

M. JAMES BAUDER

Witness _____

Signataire autorisée;

Représentant Canada Unity

MME SANDRA BAUDER

Witness _____

Signataire autorisé;

Représentant Canada Unity

M. MARTIN BRODMANN

Witness _____

Signataire autorisé

Le Sénat du Canada Président du Sénat

L'honorable GEORGE J FUREY

Witness _____

Signataire autorisée

Gouverneur général du Canada

Son Excellence l'Honorable MARY MAY SIMON

Witness _____

ANNEXE A

Loi référendaire fédérale canadienne sur les citoyens et résidents permanents canadiens

ANNEXE B

Constitution canadienne

ANNEXE C

Loi sur la protection des renseignements et renseignements et Loi sur l'accès à l'information

ANNEXE D

Déclarations et règlements nationaux et internationaux sur les droits de l'homme

ANNEXE E

Le Code de Nuremberg

ANNEXE F

Déclaration d'Helsinki de l'AMM -Principes éthiques pour la médecine
Recherche impliquant des sujets humains

ANNEXE G

Énoncé de politique du Conseil des trois pays; Conduite éthique de la recherche impliquant
Humains; tel que prévu par la loi

ANNEXE H

Loi canadienne sur les droits de la personne

ANNEXE I

Déclaration canadienne des droits et libertés

ANNEXE J

LOI de 2017 sur la sécurité nationale (National Security Act of 2017)

ANNEXE K

Lois sur les crimes contre l'humanité et les crimes de guerre (S.C.2000.c.24)

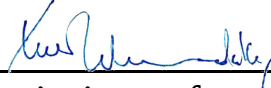
ANNEXE L

Pages de signatures des participants

This is Exhibit “__” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this **4th** day of
April, 20**22**.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



Government
of Canada

Gouvernement
du Canada

Canada.ca > [Public Health Agency of Canada](https://PublicHealthAgencyofCanada)

Requirements for truckers entering Canada in effect as of January 15, 2022

From: Public Health Agency of Canada

Latest border and travel measures

This news release may not reflect the current border and travel measures. Check [COVID-19: Travel, testing and borders](#) for the latest requirements to enter Canada.

Statement

January 13, 2022 - Ottawa, ON - Public Health Agency of Canada

Today, the Minister of Health, the Honourable Jean-Yves Duclos, the Minister of Transport, the Honourable Omar Alghabra, and the Minister of Public Safety, the Honourable Marco Mendicino, issued the following statement:

"On November 19, 2021, we announced that as of January 15, 2022, certain categories of travellers who are currently exempt from entry requirements, will only be allowed to enter the country if they are fully vaccinated with one of the vaccines approved for entry into Canada.

These groups include several essential service providers, including truck drivers. Let us be clear: This has not changed. The information shared yesterday was provided in error. Our teams have been in touch with industry representatives to ensure they have the correct information.

A Canadian truck driver who is not fully vaccinated **can't** be denied entry into Canada—Canadian citizens, persons registered as Indians under the *Indian Act* and permanent residents may enter Canada by right.

As announced in November and as we've communicated with the industry recently, starting January 15, unvaccinated Canadian truck drivers entering Canada will need to meet requirements for pre-entry, arrival and Day 8 testing, as well as quarantine requirements.

The final decision regarding entry and quarantine is made by a government representative at the port of entry, based on the information presented to them at the time.

Any individual who is symptomatic upon arrival to Canada will be directed to a Public Health Agency of Canada (PHAC) official and will be directed to isolate for 10 days from the time they enter Canada .

As of January 15, 2022, unvaccinated or partially vaccinated foreign national truck drivers, coming to Canada from the US by land, will be directed back to the United States.

To qualify as a fully vaccinated traveller and to enter Canada, foreign national truck drivers must:

- have received at least two doses of a vaccine accepted for travel, a mix of two accepted vaccines
 - or at least one dose of the Janssen/Johnson & Johnson vaccine
- have received their second dose at least 14 full days before they enter Canada
 - For example: if a driver received their second dose anytime on Saturday, January 1, then Sunday, January 16 would be the first day that they would meet the 14-day condition.
- Have submitted all required COVID-19 information into ArriveCAN.

The Government of Canada's response to the COVID-19 pandemic will continue to prioritize the health and safety of Canadians. As vaccination levels, case counts and hospitalization rates evolve, the Government of Canada will continue to consider further targeted measures at the borders—and when to lift or adjust them—to keep Canadians safe."

Associated Links

- [COVID-19 Emergency OICs in effect](#)
- [COVID-19 vaccinated travellers entering Canada – Check if you qualify as a fully vaccinated traveller](#)

- [Unvaccinated travellers entering Canada during COVID-19](#)
- [Find out if you can enter Canada](#)
- [COVID-19: Boarding flights and trains in Canada](#)

Contacts

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Minister of Health

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Senior Communications Advisor and Press Secretary

Office of the Honourable Omar Alghabra

Minister of Transport

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Media Relations

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Media Relations

Public Safety Canada

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Public Inquiries:

613-957-2991

1-866-225-0709

Search for related information by keyword: [HE Health and Safety](#) | [Public Health Agency of Canada](#) | [PPP Canada](#) | [Canada](#) | [Coronavirus \(COVID-19\)](#) | [International trade and investment](#) | [business](#) | [statements](#) | [Hon. Jean-Yves Duclos](#) | [Hon. Marco E. L. Mendicino](#) | [Hon. Omar Alghabra](#)

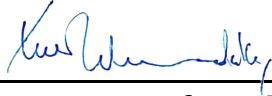
Date modified:

2022-01-14

This is Exhibit “D” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this **4th** day of
April, 20**22**.

A handwritten signature in blue ink, appearing to read "Nur Muhammed-Ally", is written over a horizontal line.

A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



Government
of Canada

Gouvernement
du Canada

[Canada.ca](#) > [Public Health Agency of Canada](#)

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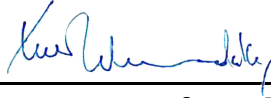
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> Canadian Trucking Alliance Statement to Those Engaged in Road/Border Protests

Canadian Trucking Alliance Statement to Those Engaged in Road/Border Protests

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The vast majority of the Canadian trucking industry is vaccinated with the overall industry vaccination rate among truck drivers closely mirroring that of the general public. Accordingly, most of our nation's hard-working truck drivers are continuing to move cross-border and domestic freight to ensure our economy continues to function.

The Canadian Trucking Alliance (CTA) does not support and strongly disapproves of any protests on public roadways, highways, and bridges. CTA believes such actions – especially those that interfere with public safety – are not how disagreements with government policies should be expressed. Members of the trucking industry who want to publicly express displeasure over government policies can choose to hold an organized, lawful event on Parliament Hill or contact their local MP. What is not acceptable is disrupting the motoring public on highways and commerce at the border.

“The Government of Canada and the United States have now made being vaccinated a requirement to cross the border. This regulation is not changing so, as an industry, we must adapt and comply with this mandate,” said CTA president Stephen Laskowski. “The only way to cross the border, in a commercial truck or any other vehicle, is to get vaccinated.”

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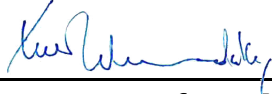


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Feedback

Significant traffic disruptions expected this weekend due to demonstrations

Posted On Wednesday January 26, 2022

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FOR IMMEDIATE RELEASE: Wednesday, January 26, 2022 4:20pm

(Ottawa) – The Ottawa Police Service (OPS) is advising the public that demonstrations expected in Ottawa throughout the weekend, starting Friday, will have significant impacts on traffic throughout the area.

Residents and visitors can expect to see a large police and emergency services presence in the Downtown core and on major highways and roads. Traffic delays and congestion will occur and may occur on a large scale.

Police and the City of Ottawa will keep the public informed on city-wide traffic and transit.

We ask that members of the public avoid unnecessary travel, especially in the downtown core, this weekend, if possible. If you do travel, plan ahead and expect significant delays.

Follow the city's traffic management tool @Ottawa_Traffic for real-time updates or utilize a traffic monitoring app like Google or Waze to check for traffic congestion before you travel.

Today, the Ottawa Police Services Board hosted a special meeting and the Ottawa Police provided details on their approach for these events. You can find out more about the information shared on the [City Council YouTube](#) page.

Further updates will be provided as more information becomes available. Follow us at @OttawaPolice for more details.

- 30 -

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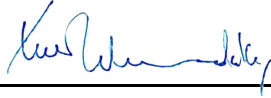
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Freedom Convoy plans to gridlock Ottawa until all vaccine mandates repealed

Up to 2,000 trucks are due on Saturday, but there will be events every day until the convoy receives an answer from the government

Rachel ParentJan 27, 2022 • January 28, 2022 • 5 minute read • [1557 Comments](#)



Tractor trailers proceed westbound on Hwy. 401 on January 26, 2022, near Summerstown, Ont., on a route that will only get busier over the next few days as Freedom Convoy 2022 arrives in Ottawa. PHOTO BY TODD HAMBLETON/POSTMEDIA NETWORK

Editor's Note: The photo caption was amended on Friday, January 28, 2022, to make clear the main image was taken a couple of days before Freedom Convoy 2022 began to reach Ottawa.

STORY CONTINUES BELOW

Thousands of vehicles could snarl Ottawa traffic for up to a week, with a convoy of truckers due to arrive as early as Friday — and some vowing to stay until they've successfully convinced the government to repeal all vaccine mandates.



The convoy was planned in response to a vaccine mandate that came into effect this month requiring unvaccinated Canadian truckers re-entering Canada from the United States to get tested for COVID-19

and quarantine. But the group is calling for all levels of Canadian government to stop the use of vaccine passports, waive fines linked to COVID-19 and reinstate employees who were fired for breaking COVID-19 rules.

“This is not about the vaccine, by the way. There’s nobody in here that’ll tell you it’s about vaccines on this entire convoy. We’ve got double jabbed, we’ve got single jabbed, we’ve got no jabbed, we’ve got the boosted,” said James Bauder, founder of the Canada Unity Foundation, one of the groups that is organizing the “Freedom Convoy 2022.”

STORY CONTINUES BELOW

We’ve got double jabbed, we’ve got single jabbed, we’ve got no jabbed, we’ve got the boosted

JAMES BAUDER, FOUNDER, CANADA UNITY FOUNDATION

“It’s not about the vaccine. It’s about the mandate.... We’re done with mandates.”

While truckers from Ontario will arrive in Ottawa on Friday, the majority will arrive on Saturday, and that’s when the protest will begin in earnest, said Jason LaFlace, an organizer who previously planned events and protests for a group called No More Lockdowns.

“The first day is going to be the 29th. We’re just going to go on a roll. And that will be the starting point, to get ourselves set up. On the 31st, the Monday, that’s the first day of business for Ottawa and for us, us freedom fighters, and Canadians all across the country. And we’re expecting a huge amount,” LaFlace said.

The plan is to essentially gridlock the city, while leaving room for traffic to businesses and emergency vehicles to get through, LaFlace said.

STORY CONTINUES BELOW

Ontario protestors who will be converging in solidarity with a convoy of truckers expected to arrive in Ottawa this weekend (Monte Sonnenberg /Postmedia)

While an itinerary hasn't been released to the public, LaFlace said organizers have arranged speakers — including politicians, truckers and Indigenous elders — and a stage will be set up in an undisclosed park on Monday. There will be events every day until the convoy receives an answer from the government.

A “memorandum of understanding,” posted on the Canada Unity website, says its coalition is opposed to restrictions and mandates related to COVID-19, rules it deems are “unconstitutional, discriminatory and segregating.”

The memorandum's goal, it says, is to form a committee with the Senate and Governor General to override all levels of Canadian government, and if they refuse to join, the group says they should “resign their lawful positions of authority immediately.”

STORY CONTINUES BELOW

Speaking at a news conference Wednesday afternoon, Prime Minister Justin Trudeau said there was a “small fringe minority who are on the way to Ottawa who are holding unacceptable views.”

“What we are hearing from some people associated with this convoy is completely unacceptable,” he added.

Transport Minister Omar Alghabra said he is “concerned about the small number of far-right, vocal opposition that is polluting much of our political debate.”

A spokeswoman for the Governor General said Rideau Hall was “keeping on top of the situation and waiting to see how things unfold.”

The Parliamentary Protection Service said in a statement it was aware of the protest and was closely monitoring the situation.

Ottawa police are communicating with the organizers and planning for the arrival of around 1,000 to 2,000 vehicles, police said Wednesday at a special meeting of the Ottawa Police Services Board. Ontario Provincial Police warned that the convoy could cause slowdowns on all highways across eastern Ontario beginning as soon as Thursday.

STORY CONTINUES BELOW

Ottawa police said that the Freedom Convoy had so far been peaceful and cooperative with police and city officials in other jurisdictions.

“We don’t have any risk information to suggest that people or business owners need to barricade themselves into their homes or businesses or that they need to close,” said Chief Peter Sloly.

But he warned that the protest could be accompanied by other elements, including counter-protests, which are harder to predict.

LaFlace and other organizers have emphasized that they are not planning violence.

We don't have any intent to create violence

ORGANIZER JASON LAFLACE

“We’ve been hearing things like, ‘Oh, you’re a domestic terrorist,’” La Place said. “We don’t have any intent to create violence.”

Tamara Lich, who organized the GoFundMe campaign that has raised more than \$5.5 million, said in a recent Facebook video that convoy participants should report anyone who is “misbehaving, acting aggressively in any way or inciting any type of violence or hatred,” to the police.

STORY CONTINUES BELOW

Tim Coderre, one of the organizers tasked with logistics, is working out of a school in Sault Ste. Marie, Ont., that Canada Unity is using as their headquarters. He said he doesn’t have a firm number on how many people will arrive in Ottawa, but reports from the road indicate that it’s a lot.

“All I’ve been hearing within the last couple hours is something in a range of 90 to 100 km of convoy. It seems awfully long to me and what I can tell you is that I’ve gotten call, call after call. It’s been nonstop,” Coderre said on Tuesday.

Truckers protesting a COVID-19 vaccine mandate for those crossing the Canada-U.S. border on the Trans-Canada Highway west of Winnipeg, Manitoba. PHOTO BY DAVID LIPNOWSKI /THE CANADIAN PRESS

Videos posted to social media have shown kilometres-long lines of trucks and other vehicles filling up highways, with crowds of dozens of people waving flags and cheering the convoys on from roadsides and overpasses.

STORY CONTINUES BELOW

The convoy is scheduled to stay for a week in Ottawa, until Feb. 4, but Coderre says it depends on when or if they get an answer from the federal government.

“I can tell you that they’ve also vowed to, if need be, to stay for however long it takes for the mandates to be lifted,” said Coderre.

The Canadian Trucking Alliance has estimated that about 15 per cent of truckers — as many as 16,000 — are not fully vaccinated against COVID-19. It has strongly denounced any protests on public roadways, highways and bridges and has urged all truckers to get inoculated.

Chris Barber is a trucker from Saskatchewan and another organizer. He left for Ottawa on Jan. 24.

He said some of the truckers in the convoy are out of work, having lost their jobs because they can no longer cross the border, while others are taking time off to support the effort.

“It should be a personal choice whether they want to get vaccinated. If they haven’t done it already, they’re probably not going to do it,” Barber said.

“The narrative out there is that we’re a bunch of unvaccinated socialists and sort of separatists. I’m actually fully vaccinated. I have a passport with me right now, this allows me to do the things that the government says I can do. And that’s exactly what we’re fed up with. We shouldn’t have to have a vaccine passport.”

National Post, with additional reporting from The Canadian Press and Ottawa Citizen



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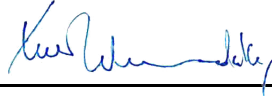
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Ottawa police brace for 'parallel groups' when trucker convoy reaches Ottawa

Ottawa police say they are preparing for a range of scenarios this weekend including the potential for violence

Marie Woolf and Joan Bryden, The Canadian Press

Jan 27, 2022 • January 27, 2022 • 4 minute read • [56 Comments](#)



Truckers depart Delta, B.C., on January 23, 2022, on a cross-country convoy destined for Ottawa to protest a federal vaccine mandate. PHOTO BY THE CANADIAN PRESS/DARRYL DYCK

OTTAWA — A convoy of truckers set to descend upon Ottawa to protest mandatory vaccinations is prompting police to prepare for violence and politicians to warn against escalating rhetoric linked to the demonstration.

STORY CONTINUES BELOW

Ottawa police Chief Peter Sloly told a police services board meeting Wednesday that officers had been in been in contact with protest leaders who he said have been co-operative and shared their plans.



But Deputy Chief Steve Bell voiced concern about “parallel groups” that intelligence suggests will also turn up to the protest. The police are trying to reach these groups — as well as counter-protesters — to discuss their aims.

At the meeting, police disclosed they are preparing for a range of scenarios including the potential for violence. Police say they are planning for the arrival of between 1,000 and 2,000 demonstrators on Saturday, but say the situation is “fluid” and changing by the hour.

Sloly told the board and councillors that he is working with the RCMP and intelligence bodies to prepare for the protests.

STORY CONTINUES BELOW

While police support the right to peaceful protest, officers would be prepared to move protesters out of the demonstration zone should the situation become violent or threatening, he said.

Prime Minister Justin Trudeau said there was a “small fringe minority who are on the way to Ottawa who are holding unacceptable views.”

Speaking at a news conference Wednesday, the prime minister said the vast majority of truckers are vaccinated.

“What we are hearing from some people associated with this convoy is completely unacceptable,” he added.

The federal government ended the truckers’ exemption to the vaccine mandate on Jan. 15, meaning Canadian truck drivers need to be fully vaccinated if they want to avoid a two-week quarantine and pre-arrival molecular test for COVID-19 before crossing into Canada.

STORY CONTINUES BELOW

The Canadian Trucking Alliance has estimated that about 15 per cent of truckers — as many as 16,000 — are not fully vaccinated against COVID-19. It has strongly denounced any protests on public roadways, highways and bridges and has urged all truckers to get inoculated.

Some with extreme, far-right views have latched onto the protest. One online video includes a man expressing hope the rally will turn into the Canadian equivalent of the Jan. 6, 2021, riot at the U.S. Capitol by supporters of former president Donald Trump.

Donald Trump Jr. took to social media Tuesday to endorse the Canadian truck convoy's fight against "tyranny" and to urge Americans to follow suit.

Kayla Preston, who studies the far right in the University of Toronto's sociology department, said the truckers were a magnet for white nationalists as well as people who oppose vaccine mandates.

STORY CONTINUES BELOW

"Some in the far-right have latched themselves onto the convoy," she said. "The convoy is tapping into the national frustration right now. They are also attracting people who are not part of the far right or white nationalists who are frustrated with COVID."

A group called Canada Unity is organizing the movement, which its members refer to as the “freedom convoy.”

A “memorandum of understanding,” posted on the Canada Unity website, says its coalition is opposed to restrictions and mandates related to COVID-19, rules it deems are “unconstitutional, discriminatory and segregating.”

The memorandum’s goal, it says, is to form a committee with the Senate and Governor General that would override all levels of Canadian government to stop the use of vaccine passports, waive fines linked to COVID-19 and reinstate employees who were fired for breaking COVID-19 rules.

STORY CONTINUES BELOW

If the Senate and Governor General refuse to join such a committee, the group says they should “resign their lawful positions of authority immediately.”

Carissima Mathen, a professor of law at the University of Ottawa, said seeking to override all levels of government policy would not work, because the body who initially put the policy in place must be the one to reverse it. Alternatively, that policy could be undone by Parliament passing a law.

A spokeswoman for the Governor General said Rideau Hall was “keeping on top of the situation and waiting to see how things unfold.”

Transport Minister Omar Alghabra said he is “concerned about the small number of far-right, vocal opposition that is polluting much of our political debate.”

STORY CONTINUES BELOW

Some supporters of the convoy, including some Conservative MPs, have taken to social media to warn the vaccine mandate for truckers will leave store shelves empty. Some have gone so far as to predict Canadians will starve.

Alhabra has assured Canadians there's no reason to fear food shortages will result from a small minority of truck drivers refusing to comply with the vaccine mandate.

A day after refusing to say whether he supported the truck convoy heading to Ottawa, Conservative Leader Erin O'Toole appeared in a Facebook Live event Tuesday evening to say he understands why many truckers, especially independent ones, are upset.

"You can understand why there's some frustration and why people are protesting," O'Toole said.

STORY CONTINUES BELOW

On Wednesday, the Canadian Federation of Independent Business also urged the federal government to reverse its vaccination policy for truckers.

Earlier, the Canadian Chamber of Commerce had urged the government to give truckers more time to get vaccinated while the Canadian Manufacturing Coalition has also called for the vaccine mandate to

be scrapped entirely.

But Alghabra said it would accomplish nothing to postpone or scrap the requirement that truckers entering Canada be fully immunized, since the United States has imposed the same requirement on truckers entering that country.

The best way to end supply chain disruptions is to end the pandemic and the best way to do that is to get vaccinated, which is what the vaccine mandate is all about, he argued.

This report by The Canadian Press was first published Jan. 26, 2022.

— With files from Stephanie Taylor and Erika Ibrahim



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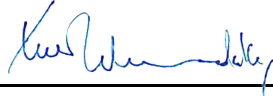
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EDITORIAL

'Freedom Convoy' must respect peace, order and our government

While the majority of the protesters headed for the nation's capital intend on having their say peacefully, fringe dissidents are itching to express themselves violently.

By **Record Editorial** Waterloo Region Record
 Fri., Jan. 28, 2022 |  3 min. read

The riots that rocked Washington, D.C. on Jan. 6 last year seemed a long, long way from Canada — and for that, most Canadians gave thanks. But with thousands of irate truckers ready to descend on Ottawa this weekend, all that could change.

While the so-called "Freedom Convoy" set out on its cross-country crusade late last week to protest restrictions on unvaccinated truck drivers, it has since become a lightning rod for anti-government and anti-vax extremists. These are hotheads who demand an end not just to vaccine mandates, but all pandemic-related public health measures. And while the majority of the protesters headed for the nation's capital intend on having their say peacefully, fringe dissidents are itching to express themselves violently.

On social media, people are advocating violence against politicians, accusing them of being communists or Nazis. One online video features a man expressing hope the rally will become Canada's version of the Capitol Hill insurrection in the U.S. that was launched last January by supporters of former president Donald Trump. Another Facebook commentator asks protesters to "flood the legislature buildings." Meanwhile, federal Conservative MPs who should know better have cranked up the heat on already simmering tensions. For instance, according to Tory finance critic Pierre Poilievre, "COVID has become a never-ending excuse for power-hungry authorities to replace our freedom with their control. Enough. Reopen our businesses, let our truckers drive, restore freedom for all." If lawmakers like Poilievre resort to such wild, toxic accusations, what will the misinformed subscribers to absurd vaccine conspiracy theories believe next? It is bizarre but also frightening that all this is happening in Canada today.

Clearly the police and federal security forces in Ottawa must be ready to respond to whatever happens this weekend. Protest organizers should be trying to rein in their more extreme followers, though that may be impossible. But this is no time for complacency or denial. What admittedly still seems far-fetched nonetheless remains possible. And at the very least, the protesting truckers say they'll paralyze the street of Ottawa with gridlock until their demands are met, even if that takes days.

The "Freedom Convoy" began its journey from the West Coast in response to a vaccine mandate that came into effect this month requiring unvaccinated truckers re-entering Canada from the United States to get tested for COVID-19 and quarantine for 14 days. At a time when the Omicron variant of COVID-19 has spread

like wildfire in both countries, there are solid medical reasons to justify this vaccine mandate and the vast majority of truckers in Canada are doing the responsible thing and obeying it. While only a small percentage of truck drivers in Canada have either refused to be vaccinated or simply object to being told what to do, they do have the right to protest, as long as they abide by the law. That said, a protest that began with limited goals has morphed into something bigger. Now the group is demanding that all levels of government in Canada stop the use of vaccine passports, waive fines linked to COVID-19 and reinstate workers who've been fired for breaking COVID-19 rules.

As if this wasn't enough, the "Memorandum of Understanding" issued by some of the protesters calls for the formation of a committee that includes the Senate and Governor General and which could somehow override all the other levels of Canadian government. If they refuse to join, the memorandum says they should "resign their lawful positions of authority immediately." Such fantasies would be laughable and easily dismissed if not for that misguided mob of Trump supporters who briefly and violently attempted to seize power from the elected government of the world's most powerful nation. Given that recent history, the threat being posed by at least some of the "Freedom Convoy" participants must be taken seriously.

For its part, the federal government is standing beside its latest vaccine mandate, which it should. Federal Conservative Leader Erin O'Toole would do the country a service if, beyond trying to "make sure that everything is peaceful" he promoted concrete ways to make this happen — and made some of his own MPs tone down the rhetoric. Meanwhile, Canadians of all political stripes should resolve to find ways to bring this country together rather than drive it apart. There's another pandemic that faces the world today — a pandemic of polarization.

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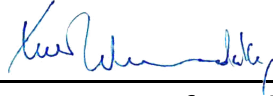
Police investigating man's death near Highway 401 and Homer Watson Boulevard

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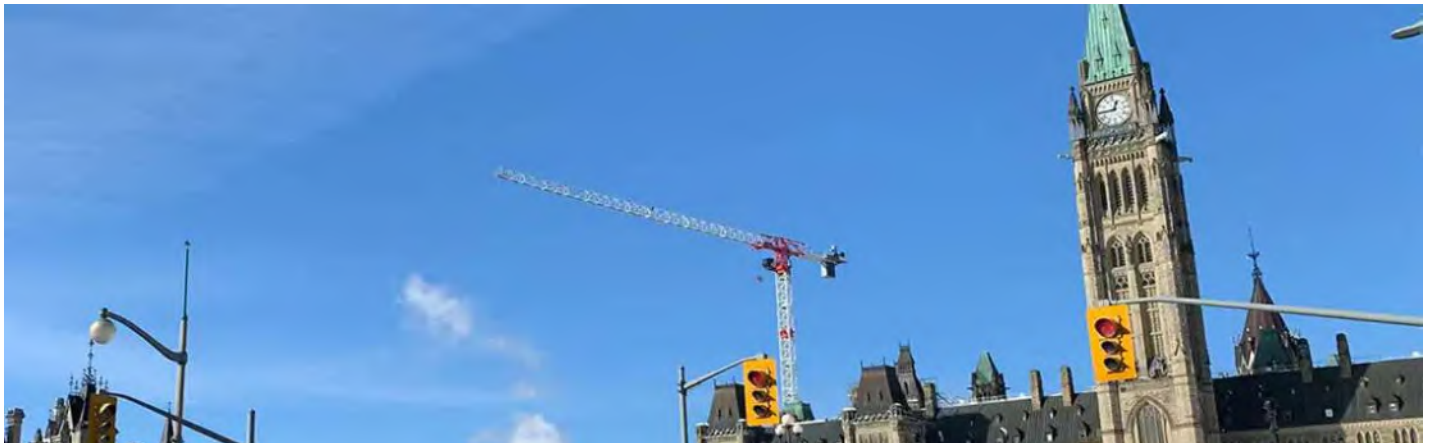
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Ottawa

Police on guard against 'lone wolf individuals' as protest convoy arrives in Ottawa

Protest will be massive in scale but 'polarizing in nature,' police chief says

[Kimberley Molina](#) · CBC News · Posted: Jan 28, 2022 1:36 PM ET | Last Updated: January 29



Ottawa police, locals brace for weekend protests

2 months ago | 2:20

Security preparations are underway in Ottawa with police keeping a close eye as the protest convoy arrives on Parliament Hill for a planned demonstration on Saturday. 2:20

Ottawa's police chief says officials are on guard against "social media actors" and "lone wolf individuals" who might try to infiltrate this weekend's protests against COVID-19 vaccine mandates.

Members of a protest that organizers call the Freedom Convoy steadily streamed into the nation's capital on Friday as various groups from across the country prepared to rally against the federal government's [vaccination mandate for all cross-border drivers](#), which came into effect earlier this month.

Trucks lined up along Wellington Street throughout most of Friday — a day ahead of when the official protest was scheduled to begin — honking their horns and blocking the road in front of both Parliament Hill and the Supreme Court of Canada, blocks away.

By Friday evening, police estimated that between the convoy's eight different streams, nearly 2,000 vehicles would converge on Ottawa on Saturday.

A count by Kingston Police on Friday morning had 17 tractor-trailers and 104 tractors without trailers, along with more than 400 passenger vehicles and six RVs, leaving the city en route to the capital. Kingston is about 174 kilometres southwest of Ottawa.



A convoy of trucks and other vehicles arrived in Ottawa ahead of the protests against vaccine mandates planned for this weekend. (Felix Desroches/CBC/Radio-Canada)

Protesters walked in between the trucks, cars and RVs, waving Canadian flags and carrying signs with messages, including #SayNoToVaccineMandates.

Ottawa police Chief Peter Sloly said residents and visitors should expect a large police presence across the city, but especially in the downtown, with officers in uniform and plain clothes.

"The demonstrations this weekend will be unique, fluid, risky and significant," Sloly told a news conference on Friday morning.

WATCH / Protest convoy begins to arrive:



Protest convoy begins to arrive in Ottawa

2 months ago | 8:04

CBC News' Hannah Thibedeau talks to Power & Politics about the protesters who have arrived in Ottawa ahead of an expected weekend demonstration. 8:04

Police and intelligence officials are also keeping a close eye on parallel demonstrations and are expected to film the weekend's events, but police said they have been unable to connect with most of the organizers.

While the protests are national in scope and massive in scale, Sloly said, they are also "polarizing in nature" and come with "significant risks."

Sloly said organizers of the main convoy have promised that demonstrations will be peaceful but that there have been various online threats locally, nationally and internationally inciting violence, hate and criminal acts.

WATCH / Avoid downtown, Ottawa police say:



Ottawa police warn people to avoid downtown core this weekend

2 months ago | 1:01

Ottawa police Chief Peter Sloly said that the demonstrations against vaccine mandates for truck drivers that are expected to happen in the city this weekend will require a large-scale response from police to ensure safety. He advised Ottawa residents and visitors to limit any business they have in the downtown area over the weekend. 1:01

"We do not know all the parallel demonstrations that may occur and/or the lone-wolf individuals who may insert themselves into the mix for various reasons," Sloly said.

At least one vehicle flying a Confederate flag was seen driving around the city's downtown on Friday. The flag of the southern U.S. states whose secession set off the American Civil War has been [taken up](#) by some white supremacist groups.

Protesters gather on Parliament Hill in Ottawa on Friday. A large number of people are expected to descend on the city to protest vaccine mandates for truck drivers and other public health measures. (Felix Desroches/Radio-Canada)

Rhetoric, threats

Some of the hateful rhetoric over public health measures has been ongoing since the start of the COVID-19 pandemic, Sloy said, and directed at local, provincial and federal politicians, including Ottawa Mayor Jim Watson.

Ottawa police say they have yet to receive a direct threat assessment for any group that's coming to the capital.

"We cannot, however, ignore the rhetoric," the chief said. "We cannot ignore the direct hate language and threats, and we cannot ignore the direct attempts to incite violence and criminality in and around the demonstration."

People wave flags as a truck participating in a cross-country convoy protesting a federal vaccine mandate for truckers makes its way along Highway 416 in Ottawa on Friday. (Justin Tang/The Canadian Press)

He also said he recognizes that comparisons to the events in Washington, D.C., last January, when a mob stormed the U.S. Capitol, will likely be on the minds of many. He said he believes Canadians will behave better.

"We have every confidence in the world that the vast majority of people who are choosing to come to this city, or who live in this city and choose to participate in some form or other in the demonstrations, will do so as Canadians do: lawfully, peacefully and with respect to everybody," Slosky said.

- [Businesses weigh options as convoy set to roll into Ottawa](#)
- [Ottawa ready to deal with violence, extremists as protest convoy arrives, says public safety minister](#)

Yet he reiterated that police are prepared to arrest, charge and prosecute any individuals or groups who incite violence or commit crimes, whether intended or spontaneous.

Police closed several roads throughout downtown Ottawa on Friday to prepare for the protesters, and more roads were expected to be closed as the convoy grew in the capital.

Supporters cheer on truck drivers in the convoy headed for Ottawa from an overpass in Kingston, Ont., on Friday. (Lars Hagberg/The Canadian Press)

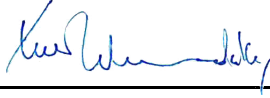
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CANADA

As 'Freedom convoy' hits Ottawa, Nova Scotia moves to ward off blockade at New Brunswick border

'Nova Scotians have no patience for highway blockades'

By **Steve McKinley** Halifax Bureau
 Fri., Jan. 28, 2022 | 3 min. read

[READ THE CONVERSATION \(27 \)](#)

HALIFAX—Nova Scotia has issued a highway blockade ban, citing the areas near the border with New Brunswick, ahead of demonstrations that are expected to be held in parallel with Saturday's trucker "Freedom convoy" protest in Ottawa.

In a directive released under the province's Emergency Management Act late Friday afternoon, Municipal Affairs and Housing Minister John Lohr prohibited partial or complete blockades on all the roads in the province, before specifically citing the provincial border and the trucker protest.

"It is a criminal offence to blockade a highway anywhere at any time," said ministry spokesperson Krista Higdon in an email.

"The directive applies to people who stop or gather alongside Highway 104, the Nova Scotia-New Brunswick border, or at the Cobequid Pass toll area in support of the 2022 Freedom Convoy, the Atlantic Hold the Line event, or others organized to interfere with traffic. Allowing people to gather in those areas would put themselves and others at risk."

The move follows comments made earlier this week by Nova Scotia Premier Tim Houston.

"My message to anyone planning a blockade of a highway is — don't do it," Houston said Wednesday. "Nova Scotians have no patience for highway blockades and, personally ... I have even less, so just don't do it."

In June 2021, protesters decrying pandemic border restrictions brought traffic to a halt for about 24 hours on the Trans-Canada Highway between Sackville, N.B., and Amherst, N.S., before police cleared the road and arrested three protesters.

This past weekend, protests near the border in support of the "Freedom Convoy" slowed but did not block traffic on the highway, said David Kogon, mayor of Amherst. He said his understanding from those protesters was that they would attempt to do the same again this weekend.

"The blockade they had in (June), when they completely blocked the highway created huge problems," he said. "The hospital services had to be reduced because doctors and nurses couldn't get to the hospital and things were cancelled.

"So, we're very concerned that that kind of thing could happen. But last weekend, that's not what they did."

"I think (the province is) trying to caution and reduce problems at the border by saying they're going to act and not let an illegal blockade happen."

Blockading a highway is a federal criminal offence; the new provincial directive not only reinforces that, but prohibits gathering along the side of, or in the area of the transborder highway, with the intent to interfere with "the normal flow of traffic."

Making those acts a provincial offence means that police can issue a summary offence ticket. Under this directive, the fines can be steep — \$3,000 to \$10,000 for an individual and as much as \$100,000 for a corporation.

RCMP spokesperson Const. Jeff Wilson said the Mounties have moved some additional resources into the area in anticipation of protests.

But with another major winter storm scheduled to hit the Atlantic provinces — by some forecasts dropping 45 centimetres of snow near the border — Wilson said there could be significant safety issues.

“We’re all hoping that people make good decisions and account for the safety of the people involved,” he said. “If we do have an Atlantic weather system coming through, it certainly could potentially be a dangerous situation.”

In October 2021, the Nova Scotia government controversially passed the Protecting Access to Health Services Act, which banned protests that blocked access to hospitals and health-care facilities. It joined Quebec and Alberta, which both have similar bans.

With file from The Canadian Press



Steve McKinley is a Halifax-based reporter for the Star. Follow him on Twitter: [@smckinley1](https://twitter.com/smckinley1)

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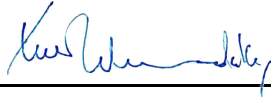
We have to live with the dangerous Freedom Convoy fringe. But politicians don't have to lend them support

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> Statement by Canadian Trucking Alliance President on Ottawa Protests

Statement by Canadian Trucking Alliance President on Ottawa Protests

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Earlier this week the Canadian Trucking Alliance (CTA) **issued its position** (<https://cantruck.ca/canadian-trucking-alliance-statement-to-those-engaged-in-road-border-protests/>) on the convoy protesting the bilateral mandate introduced by the Governments of Canada and the United States that requires all essential workers, including truck drivers, to be vaccinated. The only way to cross the border, in a commercial truck or any other vehicle, is to get vaccinated. As an industry we must adapt and comply with this mandate and the vast majority have.

While a number of Canadians are in Ottawa to voice their displeasure over this mandate, it also appears that a great number of these protestors have no connection to the trucking industry and have a separate agenda beyond a disagreement over cross border vaccine requirements. As these protests unfold over the weekend, we ask the Canadian public to be aware that many of the people you see and hear in media reports do not have a connection to the trucking industry.

To those in the trucking industry that have chosen to participate in this protest regarding cross border mandates, we ask that you engage in a peaceful demonstration today then leave the City of Ottawa to avoid any issues to the welfare and safety of the citizens of Ottawa. Your behaviour today will not only reflect upon you and your family but the 300,000 plus fellow Canadians that, like you, take great pride in our industry. Please remember this important responsibility you bear today in delivering your message responsibly but also the

impact your actions will have on the image of the majority of your colleagues from coast-to-coast who do not share your opinion but share your passion for the industry and country.

Over the last 24 months, CTA has and will continue to work with the Government of Canada to mitigate the impact of COVID-19 on the supply chain. This includes several health and safety measures like raising vaccine rates in our sector. CTA will continue this work to benefit our sector and, by extension, the Canadian economy. This work will begin again this Monday when the Government of Canada hosts the National Supply Chain Summit.

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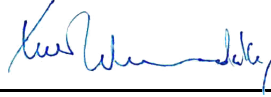
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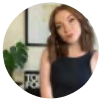
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CANADA

Some trucker convoy organizers have history of white nationalism, racism



By **Rachel Gilmore** • Global News

Posted January 29, 2022 12:34 pm ▼



WATCH: Protest convoy nearing Ottawa sparks concerns over possible extremist violence – Jan 27, 2022



-A

A+

As the first vehicles from [the trucker convoy](#) started appearing on Ottawa streets, some Twitter users shared a particular photo: a pickup truck with a confederate flag flying from the bed.

Now, as the convoy descends on Ottawa with the stated aim of opposing all [COVID-19](#) mandates, anti-hate experts allege those with white nationalist and Islamophobic views don't just represent the fringes of the movement but are among the organizers of the convoy.

"We're saying that this is a far-right convoy because — from day one — the organizers themselves are part of the far-right movement," said Evan Balgord, executive director of the Canadian Anti-Hate Network.

"They have previously been involved in far-right movements and have made Islamophobic comments in the past."

READ MORE: [Trucker convoy protest arrives in Ottawa for multi-day demonstration](#)

STORY CONTINUES BELOW ADVERTISEMENT

It can be difficult to determine who is a key organizer of the convoy, but there are some names that emerge time and time again — whether as authors of the \$7.4million GoFundMe campaign, as points of contact on the website that boasts a petition with 240,000 signatures, or on social media posts providing widely-shared directions to anyone hoping to join.

2:54**Trucker convoy vows to stay in Ottawa until demands ...**

Trucker convoy vows to stay in Ottawa until demands met – Jan 29, 2022

Global News contacted all the organizers mentioned in this story, but none responded by the time of publication. Jason LaFace, an Ontario organizer, did pick up the call, but upon the reporter identifying themselves, immediately laughed, said “no thank you,” and hung up the phone.

What does the convoy want?

The convoy initially kicked off with a focus on opposing vaccine mandates — especially the one aimed at truckers. The government announced in November 2021 that all Canadian truckers seeking to cross the border from the United States would need to be vaccinated in order to avoid a 14-day quarantine. That mandate went into effect on Jan. 15.

STORY CONTINUES BELOW ADVERTISEMENT

The U.S. also instituted its own ban on unvaccinated truck drivers a week after Canada implemented its policy.

In the days since the trucks hit the road, the stated goal of the movement has become muddled.

One trucker who is headed to the protest, Brigitte Belton, told Global News in a Friday interview that her goal is “to get freedom back,” and that she is “not here for politics.”

Commenting on other participants whose goals may be more extreme, she said “whatever their agendas are, that’s not what we’re here for. So they need to be quiet. They need to go home.”

READ MORE: [Organizer of GoFundMe campaign for trucker convoy withdraws \\$1M, company confirms](#)

A group affiliated with the convoy, Canada Unity, has produced a “memorandum of understanding” that it plans to present to Gov. Gen. Mary Simon and the Senate, and which it believes would force the government to rescind COVID-19 public health measures, or force the government to resign en masse.

“The GG wouldn’t dismiss a Cabinet that hasn’t lost the confidence of the Commons ... moreover, the GG has no authority to independently rescind laws or regulations,” said parliamentary expert Philippe Lagassé.

Who is organizing the convoy?

The convoy has a number of participants with different goals and isn’t cohesive, but some popular webpages help paint a picture of the people behind the convoy.

STORY CONTINUES BELOW ADVERTISEMENT

There is a GoFundMe page that has raised more than \$7 million for the trucker convoy. That fundraiser has two names on it: Tamara Lich, and B.J. Dichter.

Speaking to a cheering crowd at a People's Party of Canada convention in 2019, [B.J. Dichter warned listeners](#) about the dangers of “political Islamists,” and said the Liberal Party is “infested with Islamists.”

Trucker convoy: Thousands descend on Canada's ...



He added that, by meeting “with extremists,” Conservative and “establishment” politicians “put at risk moderate and secular Muslims, who

want nothing more but to integrate into Canada, to become Canadian, and to leave the garbage of their birth country behind them.”

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“Despite what our corporate media and political leaders want to admit, Islamist entryism and the adaptation of political Islam is rotting away at our society like syphilis,” he added, [according to a story written for the Toronto Star](#) by Alex Boutilier, who is now employed by Global News.

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Another dominant voice within the convoy community is a man named Patrick King. King is listed as a contact for North Alberta on Canada Unity’s website, which hosts the memorandum of understanding that boasts more than 240,000 signatures.

King's name was repeatedly mentioned on the convoy's walkie-talkie app, Zello, on Friday — but he has ended up in the public eye for different reasons in the past, according to footage posted online.

In a [video posted on Twitter in 2019](#), King suggests that unless Canadians “get up off your as—s and demand change,” they might want to change their names to “Ishmael” or “drop a bunch of change down the stairs” and “call yourself chong ching ching chang.”

In [other video footage](#), King can be seen repeating racist conspiracy theories. In [one clip posted to Twitter by another user](#), King says “there’s an endgame, it’s called depopulation of the Caucasian race, or the Anglo-Saxon. And that’s what the goal is, is to depopulate the Anglo-Saxon race because they are the ones with the strongest bloodlines,” he said.

“It’s a depopulation of race, okay, that’s what they want to do.”

READ MORE: [‘Fringe minority’ in truck convoy with ‘unacceptable views’ don’t represent Canadians: Trudeau](#)

He then talks about men with the first names “Ahmed” and “Mahmoud” who he claims are trying to “not only infiltrate by flooding with refugees, we’re going to infiltrate the education systems to manipulate it” so there is “less procreation” which leads to “less white people — or you know, Anglo-Saxon. Let’s say Anglo-Saxon, because when I say white, all the ANTIFA guys call up the race card.”

STORY CONTINUES BELOW ADVERTISEMENT

In [a Facebook Live posted directly to his page](#), King says that COVID-19 is “not a naturally occurring virus.”

“It’s not a naturally occurring virus, it’s a man-made bioweapon that was put out to make people sick, to push the narrative for all these jabs, is what it was,” he said.

“Because the jab is the, they want to be able to track you, follow you, know your every movement you do.”

King did not answer two phone calls or respond to emails from Global News.

Jason LaFace — who at times uses the name “LaFaci” — is listed as the North and East Ontario organizer for the convoy on the Canada Unity website, and has been cited in other media [as the main organizer for Ontario](#). In photos posted to his Facebook page, which were screenshotted by Global News, he shared an image titled “Canadian politicians who are not born in Canada” and included his own caption: “traitors to our country.”

According to a screenshot obtained by Global News, LaFace posted a selfie where he wore a hat with what appears to be the initials S.O.O., which [is believed to stand for Soldiers of Odin](#) — an anti-immigrant group first established in Finland.

The emergence of the far-right Soldiers of Odin group in Canada raised concerns about the potential for “anti-immigrant vigilantism,” according to [a de-classified intelligence report obtained by Global News in 2017](#).

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Screenshot/Global News

“One of the admins on their website is actually somebody who’s like the vice president of the Soldiers of Odin, a skinhead group in Sudbury, Ont.,” said Dr. Carmen Celestini, a post-doctoral fellow with the Disinformation Project at Simon Fraser University.

“His name is Jason LaFace. He also uses other names, but he is a vice president of this group, which organize events that will try to stop immigration, people who are BIPOC or people who are in LGBTQ communities.”

“Last summer,” she added, LaFace posted a message on Facebook indicating that he planned to “paint over a mural in Sudbury for (Black Lives Matter).”

LaFace later apologized, saying he “should have researched a bit more what was going on in terms of the mission and why it was sanctioned by the city.”

STORY CONTINUES BELOW ADVERTISEMENT

“I apologize for my behaviour to the entire city,” he said, [according to the Sudbury Star](#).

However, LaFace showed a slight change of heart [in a recent Facebook Live](#).

“This whole moment in history right now has changed my life for better, for the rest of my life,” LaFace said.

“I’m not a bitter little a–hole like I used to be, where I was pretty ignorant to some people online.”

READ MORE: [Far-right groups hope trucker protest will be Canada’s ‘January 6th’](#)

However, in that same video, LaFace also issued a message about Prime Minister Justin Trudeau.

“There’s things that are working in the background right now, that I found out this morning, Justin Trudeau is going buh-bye. It’s true, he is,” he said.

“It’s done, so now we just have to deploy our plan ... he’s gone when we’re done.”

When Global News attempted to contact LaFace for a comment, he said “no thank you” and hung up.

Muddying the convoy's cause

As the ideologies allegedly supported by a number of the convoy’s organizers make headlines, some truckers are getting frustrated.

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“We’re here to get freedom back. That’s what we’re here to get, out here for. Whatever their agendas are, that’s not what we’re here for,” said Belton, referring to the more extreme voices tied to the movement.

Belton is a trucker who has been regularly making TikTok videos about the convoy and plans to attend Saturday’s protest. She is also listed as a Sarnia contact on the Canada Unity webpage.

“They need to go home. We don’t need them. We don’t need their numbers. Yeah, we’ve got huge numbers with just people that want to go back to a normal life and that’s what we want,” she said.

READ MORE: [Singh’s brother-in-law has asked for his \\$13K trucker convoy donation back, source says](#)

Lich, an organizer of the truck convoy, said in a video posted to the convoy’s Facebook page that those promoting violence or hate do not reflect the position of the protesters.

“As you know, we are on our way to Ottawa to hold a peaceful protest. I just want to put it out there that nobody in this convoy will be inciting violence or uttering threats. That is not what we’re here to do,” Lich said in the video.

“If you see anybody trying to associate themselves with us that is acting in that way, you need to get their truck number and their licence plate and report it to the police.”

STORY CONTINUES BELOW ADVERTISEMENT

For some, the individual views of organizers aren't as important as what they're doing for the cause.

When Belton was asked specifically about organizers and told some of what Global News had uncovered about LaFace and King, she said the information about the purported views is "irrelevant" for her.

"I'm coming here for freedom," she said.

"All I know is that they're good people to me and they are helping me."

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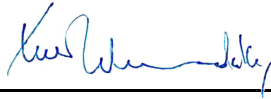
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Politics

Thousands opposed to COVID-19 rules converge on Parliament Hill

Trudeau and his family have been moved from residence over security concerns

[John Paul Tasker](#) · CBC News · Posted: Jan 29, 2022 4:00 AM ET | Last Updated: January 29



Protesters gather on Parliament Hill to demonstrate against vaccine mandates, on Saturday. (Alexander Behne/CBC)



A convoy of thousands of truckers and other protesters converged on Parliament Hill Saturday to call for an end to COVID-19 vaccine mandates and other public health restrictions — a raucous demonstration that has police on high alert for possible violence even as organizers urge the crowd to be peaceful.

Hundreds of protesters on foot flooded into the parliamentary precinct on Saturday in the midst of an extreme cold warning, joining a lineup of truckers that started to arrive on the scene late Friday night.

They were later joined by other drivers and demonstrators from all regions of the country that, in some cases, travelled thousands of kilometres to take their message to the streets outside of the Prime Minister's Office in the downtown core.

Police said as many as 10,000 people were expected to be on hand by day's end, but by Saturday evening the force did not have an official estimate of the crowd's size. Also that evening, the group organizing the convoy sent out a schedule for Sunday events, including a prayer and press conference.

The convoy has snarled traffic throughout the region, clogging arteries that lead in and out of the city centre. Law enforcement urged everyone to avoid travel to the downtown as it deals with the surge of people. The Rideau Centre, a major shopping centre only steps from the main protest site, was closed early after it was overrun with maskless patrons defying provincial rules for indoor spaces.

WATCH / An on-the-ground look at the Parliament Hill protests:





An on-the-ground look at the Parliament Hill protests

2 months ago | 1:26

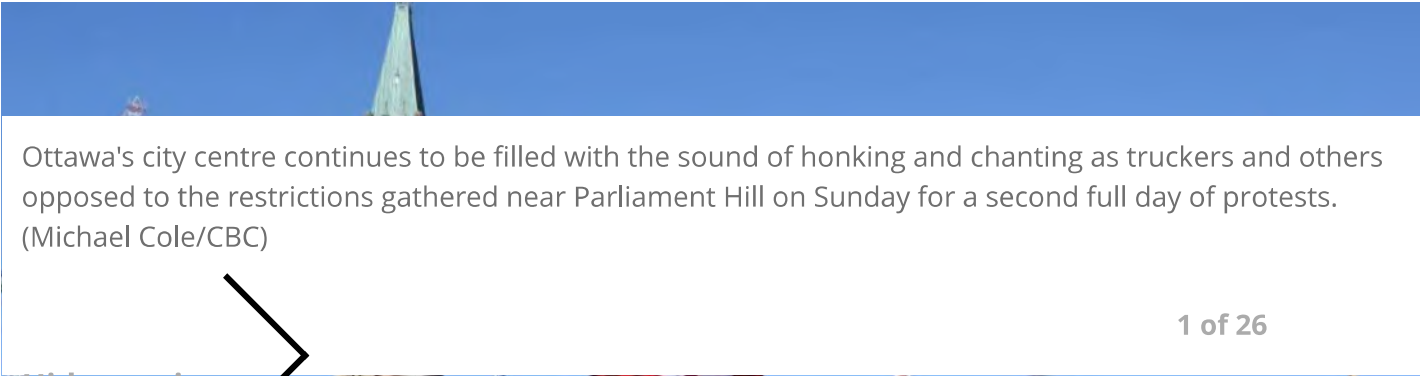
CBC's David Common provides an update on the state of protests in Ottawa on Saturday as thousands called for an end to COVID-19 vaccine mandates and other public health restrictions. 1:26

The many trucks that have gathered along Wellington Street in front of the Parliament Buildings are adorned with banners denouncing public health measures and Prime Minister Justin Trudeau. Some warn that communism will take hold in Canada if COVID-19-related restrictions continue. Dozens of truckers blasted their horns throughout the day and into the evening.

Amid security concerns, Trudeau and his family have been moved from their home to an undisclosed location in the nation's capital, sources said.

The protest, while loud and disruptive, has been peaceful to this point. As of 5:30 p.m. ET on Saturday, no charges have been laid against any of the protesters, a spokesperson for the Ottawa Police Service said. The police said at 8 p.m. ET no incidents of violence or injuries had been reported.





Ottawa's city centre continues to be filled with the sound of honking and chanting as truckers and others opposed to the restrictions gathered near Parliament Hill on Sunday for a second full day of protests. (Michael Cole/CBC)

1 of 26

A demonstration that was originally planned to urge the federal government to drop its vaccine mandate for cross-border essential workers like truckers has morphed into a larger movement against all public health measures.

A number of the people assembled, many of whom are not truckers, said they were on hand to pressure the government to end pandemic-related restrictions and return to "normal." The event has also attracted some more extreme voices who have called for violence.

Roughly a dozen protesters had parked their vehicles on the site of the Tomb of the Unknown Soldier at Ottawa's National War Memorial earlier Saturday. The cars and trucks were removed by midday after orders from local police. "Parking on this sacred ground was a sign of complete disrespect," Ottawa Mayor Jim Watson said.

Later, protesters were seen dancing on the Tomb of the Unknown Soldier, prompting condemnation from Veterans Affairs Minister Lawrence MacAulay and Canada's top soldier Gen. Wayne Eyre.

General / Général Wayne Eyre 

@CDS_Canada_CEMD



I am sickened to see protesters dance on the Tomb of the Unknown Soldier and desecrate the National War Memorial. Generations of Canadians have fought and died for our rights, including free speech, but not this. Those involved should hang their heads in shame.

5:36 PM · Jan 29, 2022



38.9K



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Defence Minister Anita Anand called the behaviour of protesters "beyond reprehensible." The NDP called it "despicable" and denounced symbols of hate seen in the crowd.

Demonstrators also adorned a statue of Terry Fox, the cross-country runner who inspired the nation with his "marathon of hope," with anti-vaccine material and a defaced Canadian flag.

Conservative Leader Erin O'Toole similarly condemned the actions of those involved with the incidents at the Tomb of the Unknown Soldier and Terry Fox statue.

A statue of Terry Fox is decorated with an upside down Canadian flag, protest sign and hat as protesters participating in a cross-country truck convoy protesting measures taken by authorities to curb the spread of COVID-19 and vaccine mandates gathered. (Adrian Wyld/The Canadian Press)

"I support the right to peacefully protest but that should not be confused with blatant disrespect for the men and women who have served, inspired, and protected our country," he said in a statement, saying the individuals in question should be "ashamed."

In another instance, a can of beer was thrown at a journalist covering the event. Protesters also set off fireworks as the evening began, which Ottawa police said Saturday should not be used downtown.

Standoff over science

The many flags flown in the crowd reflected the divergent groups that are calling for an end to mandates.

Some of the protesters carried Canadian flags, while others held placards that urged people to "Think for Yourself," a slogan used in anti-vaccine circles. Some demonstrators were seen flying the Patriotes flag, a nod to the Lower Canada rebellions of 1837-38, when French-speaking settlers from present-day Quebec fought against British colonial rule.

At least one Confederate flag was spotted in the crowd, a holdover from the U.S. Civil War that is often associated with racist and far-right elements. Indigenous demonstrators flew the Mohawk warrior flag and waved the flag of the Métis Nation.

WATCH | Timelapse shows protesters gathering on Parliament Hill:



Timelapse shows protesters gathering on Parliament Hill

2 months ago | 0:37

Thousands of protesters gathered in Ottawa on Saturday to call for an end to COVID-19 vaccine mandates and other public health restrictions. This timelapse video shows the growth of the crowd on Parliament Hill as of early Saturday afternoon. 0:37

"I've never done anything like this in my life. I'm 53 years old and this is the hill I'm going to die on. Do not tell me I have to put something in my body," Lorraine Commodore, a convoy supporter, told CBC News on Saturday.

Commodore said she was fired from her job as a dental hygienist because she wouldn't get vaccinated. She said she wants this protest to bring an end to mandates that cost her and others like her their jobs.

She said her mother-in-law died in hospital and it was difficult for the family to visit her in the last days of her life because of COVID-19 restrictions on visitors. "Open the hospitals, they're public. This needs to end today."

Her husband, Mike, said he's distrustful of the shots — skepticism that cost him his job as a community living nurse.

- [**COVID-19 protesters demonstrate across Canada in support of truck convoy in Ottawa**](#)
- [**Protest convoy continues to block traffic to U.S. border: RCMP**](#)

"How many boosters is it gonna take? Wake up, people. How many boosters? People who've taken the two shots, they're still coming down with COVID-19. They're still testing positive. So, where's the science? What science? It's amazing what government scientists will say when their paycheques depend on it," he said.

The Public Health Agency of Canada (PHAC) reported earlier this month that the primary series of vaccines — the first two doses of an mRNA product — offer "low" to "very low" protection against an Omicron infection but that they still prevent severe cases of COVID-19, hospitalization and death.

PHAC data suggests unvaccinated people are 19 times more likely to be hospitalized with COVID-19 than fully vaccinated people. A third dose of an mRNA shot also offers much more protection against an actual infection.

Amid this standoff over science, there was also a smattering of counter-protesters who waded into the crowds to bring a pro-vaccine message to a group that is generally leery of the COVID-19 shots. "I believe in public health. Thank you nurses," read one of the signs carried by this group.

A counter-protester holds up a pro-vaccine sign in Ottawa on Saturday. (David Common/CBC)

Trudeau, family moved for security reasons

Trudeau and his family are no longer at their home, Rideau Cottage, which is on the property of the Governor General's residence in the New Edinburgh neighbourhood of Ottawa — roughly four kilometres from the epicentre of the protest.

The Prime Minister's Office said it could not comment on Trudeau's whereabouts for security reasons. His itinerary, which normally lists the city where he's staying, said only that he's in the "national capital region."

Trudeau is currently in isolation because he was a close contact to one of his children who recently tested positive for COVID-19.

Police said as many as 10,000 people were expected to be on hand Saturday, but by the evening the force had not offered an official estimate of the crowd's size. (Alexander Behne/CBC)

The decision to move Trudeau and his family follows the Rideau Hall gate-crashing attack in 2020. A Canadian Armed Forces member carrying a firearm rammed his vehicle into the gates protecting the property in an attempt to reach Trudeau.

The precautionary measure also comes after a warning from Parliament's Sergeant-at-Arms, the person responsible for the safety and security of the parliamentary precinct and its occupants, that protesters could show up at politicians' homes.

Ottawa police Chief Peter Sloly said that while organizers say the protest, which does not have a permit, will be a weekend event, "the option of [it] going into the week is also still on the table."

Sloly said any decision to bring the protest to a close early or continue past the weekend will be based on public safety concerns. He also said a breakdown in communication with protest organizers could lead to it being shut down early.

The police said late Saturday there would continue to be a large presence of officers during the evening and Sunday.

- [**Thousands of vehicles, pedestrians arrive with truck convoy in Ottawa**](#)
- [**Ottawa ready to deal with violence, extremists as protest convoy arrives, says public safety minister**](#)

Public Safety Minister Marco Mendicino said Ottawa's officers will be backed up by other police and national security forces, who are preparing to deal with any threats that could erupt from extremists who have latched on to a massive protest organizers call the Freedom Convoy.

Mendicino said Friday that there have been signs of "flagrant extremism" among some protesters, including the equating of vaccine mandates to the fascist regime of Nazi Germany and inciting people to overthrow the government through violence.

That is "not about freedom. And it's certainly not about truckers," he told guest host Nil Köksal on CBC's *Power & Politics*.

The Ottawa Police Service said it will be augmented with officers from Toronto, London, York and Durham regions, as well as the Ontario Provincial Police.

Demonstrators holding signs participate in a cross-country truck convoy protesting vaccine mandates and public health measures to curb the spread of COVID-19, on Parliament Hill in Ottawa on Saturday. (Adrian Wyld/The Canadian Press)

Ottawa vigil to mark mosque shooting cancelled

The organizers of an Ottawa vigil commemorating victims of a fatal shooting at a Quebec City mosque in 2017 have cancelled the planned event, citing the convoy.

The event, which was scheduled for Saturday, the fifth anniversary of the violent hate crime, is not going ahead "because of the possibility of violence related to the truckers protest," the organizers said.

- [Vigil in Ottawa to mark mosque attack cancelled due to safety concerns around convoy protest](#)

"The fact that we had to cancel this memorial event marking a tragic anniversary for Canadian Muslims is not only disappointing but it angers me," said Fareed Khan, the founder of Canadians United Against Hate.

"This so-called freedom protest, and the possible violence that may be caused by those connected to it, has denied me, the Muslim community and residents of the National Capital Region our freedom to gather peacefully to mark a very sombre occasion and remember the six victims of the Quebec City mosque shooting."

Organizers urge calm

One of the protest's key organizers on Friday warned participants to demonstrate peacefully.

"We cannot achieve our goals if there are threats or acts of violence," said B.J. Dichter. "This movement is a peaceful protest, and we do not condone any acts of violence."

He warned protesters not to enter government buildings, disrespect police officers, act in a way that escalates tense situations and make "any type of threat."

A man supporting a cross-country convoy protesting measures taken by authorities to curb the spread of COVID-19 holds a flag with an expletive against Prime Minister Justin Trudeau in front of Parliament Hill. (Justin Tang/The Canadian Press)

Dichter ran as a candidate for the Conservatives — in Jack Layton's old riding of Toronto–Danforth — in the 2015 federal election, finishing third behind the Liberals and NDP with just over 5,000 votes.

In 2019, Dichter spoke at the first People's Party of Canada conference held in Gatineau, Que., where he railed against "political Islam" and argued that the radical left in Canada is working with Islamic groups to undermine the Canadian state.

On Twitter, he regularly criticizes public health measures to fight COVID-19, major media organizations, socialism and established political parties.

- [Downtown shoppers, hotel guests steer clear of 'frustrating' protest](https://www.cbc.ca/news/politics/truck-convoy-protest-some-key-players-1.6332312)

He and Alberta resident Tamara Lich started a GoFundMe campaign for the convoy that has raised more than \$7.5 million.

As the convoy moved across Canada, Lich posted regular video updates from the cab of one of the trucks. She says her parents own a trucking company, which is part of what motivated her to organize the protest. Lich was involved with the Western separatist Maverick Party in the past and is still listed as its secretary on the party's website.

She has said many times in her Facebook videos that the trucks and demonstrators won't leave Ottawa until they get what they want, while urging people to obey the law and not cause trouble.

Politicians weigh in

Earlier this week, NDP Leader Jagmeet Singh condemned the convoy, saying it harbours racists. Trudeau has been equally unreceptive, dismissing what he calls a "small fringe" that holds "unacceptable views."

While rejecting bigotry and hate, Conservative Leader O'Toole said Canadians frustrated with two years of COVID-19 restrictions should be heard by elected officials. O'Toole met with some of the truckers in the convoy away from Parliament Hill on Friday.

Former U.S. president Donald Trump endorsed the convoy's efforts during a rally in Conroe, Texas, on Saturday evening, claiming the protesters in Ottawa were doing more to fight against "lawless mandates" and defend "American freedoms" than U.S. leaders.

At least one Canadian parliamentarian was among Saturday's crowd. Conservative MP Michael Cooper, who represents an Edmonton-area riding, told CBC News he was there to show support to "a whole lot of everyday Canadians" that were out to express "concerns with the direction Justin Trudeau is taking the country."

"The vaccine mandate just doesn't make any sense, and it's only going to exacerbate our supply-chain issues," Cooper said. A number of [business groups](#), including the Canadian Chamber of Commerce, warned this week the trucker mandate could disrupt the free flow of goods between Canada and the U.S.

Cooper said while there may be a "small number of unsavoury characters" in the mix, most of the people are "just here to send a message to the prime minister."

"I'm just here to let people know they're being heard."

With files from the CBC's Ashley Burke, Travis Dhanraj and Peter Zimonjic

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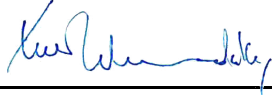
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and referred to in the affidavit of

Rebecca Coleman

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A Commissioner for taking affidavits

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Rideau Centre closes after maskless protesters are seen confronting staff

Many protesters were seen entering the mall to eat, use washrooms and escape the frigid temperatures.

Marco Vigliotti, Matthew LapierreJan 29, 2022 • January 29, 2022 • 2 minute read •  [Join the conversation](#)



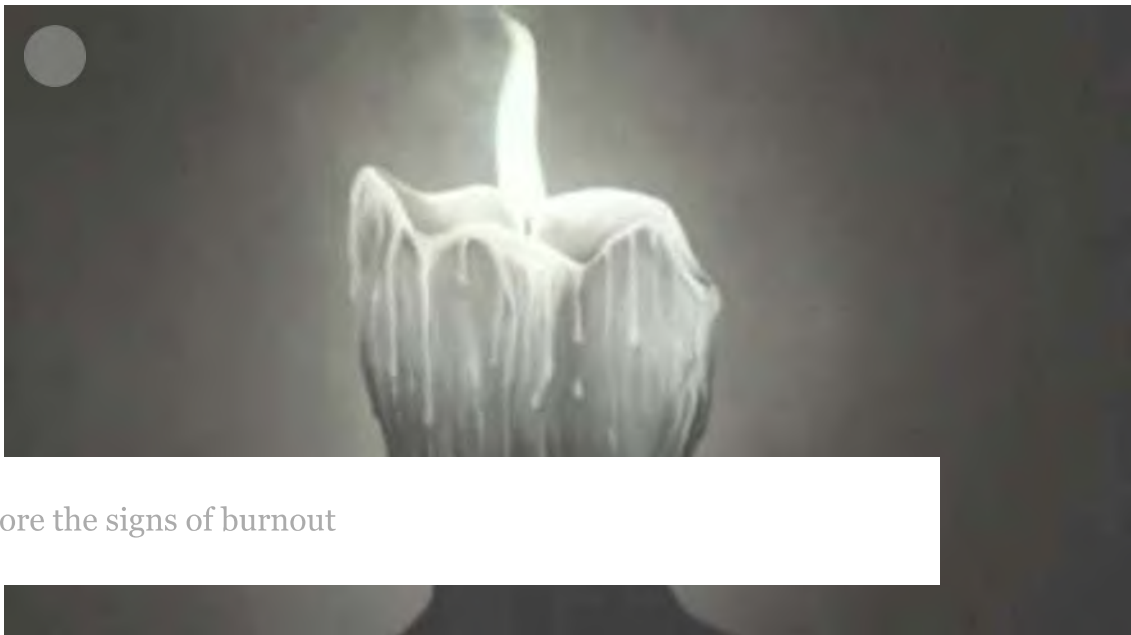
Unmasked protesters were inside the Rideau Centre shopping centre on Saturday. The mall was closed in late afternoon. PHOTO BY ERROL MCGIHON /Postmedia

The Rideau Centre closed to the public Saturday afternoon after maskless protesters were seen confronting employees who wore masks, and eating and drinking throughout the facility in defiance of public health orders.

STORY CONTINUES BELOW



There was no word immediately on whether the mall would reopen on Sunday.



Don't ignore the signs of burnout

In a statement, mall owner Cadillac Fairview said the decision to close the mall was made “out of an abundance of caution.”

“The safety of our guests, tenants and employees is our priority,” the statement read.

Security staff began closing the mall and ushering people outside just before 3 p.m. as Freedom Convoy protests continued to swell in nearby streets. Many protesters were seen entering the mall to eat, use washrooms and escape the frigid temperatures.

Though many of the protesters who sat on the ground and waited in line for the bathroom appeared sullen and tired, cries of “freedom” and chants using an expletive to refer to Prime Minister Justin Trudeau were quickly taken up by the crowd. They echoed through the mall.

Protest supporters were also seen urging mall staff to take off their masks.

“You’re free now,” one maskless man told a worker who sat at a booth. “You don’t have to wear that.”

By early afternoon, security guards had long since given up trying to get the protesters to wear masks.

“There are so many people and they are very aggressive,” one security guard said.

Rayene Bimbachi, 22, works at the mall and said a Rideau Centre employee was “shaking and crying” as she told her the mall was shutting down due to the crowds.

She said protesters had been getting in confrontations with mall staff all day and she had been questioned multiple times about why she was wearing a mask. As her store closed, she said two women told her she was only closing out of fear of the protesters.

After closing, she said she ran out of the mall to avoid any further interactions with protesters.

“I tried to just keep my head down. It was the scariest thing I’ve ever seen in the mall and I’ve worked there for four years,” Bimbachi said.

The protesters could be heard chanting against the federal government and Trudeau throughout the day, she said, with some even protesters smoking inside the mall in violation of regulations.



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THIS WEEK IN FLYERS

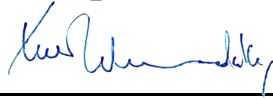
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This is Exhibit “P” mentioned to
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Update on Weekend Demonstrations

Posted On Saturday January 29, 2022

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FOR IMMEDIATE RELEASE: Saturday, January 29, 2022 2:45pm

(Ottawa) – A large police and emergency services presence continues in downtown Ottawa to ensure the safety of residents, businesses, and participants during this weekend's demonstration.

Large crowds have gathered in the area of Parliament Hill as well as heavy trucks and passenger vehicles. Police are making adjustments to manage the changing nature of the demonstration. A crowd/vehicle estimate will be provided at the end of the demonstrations.

Vehicles are being redirected away from the core to mitigate road safety issues. We are once again asking that people do not come into the core unless it is necessary.

We are aware this demonstration is having a significant impact on local residents and businesses – we are working to mitigate these concerns.

The police response includes officers from RCMP, Toronto, Durham, London, York police service as well as the OPP. Police resources are in place and will remain throughout the demonstration. At this time, the crowds are peaceful and there are no major incidents to report.

Police are working to maintain emergency lanes and any other places that police need to keep clear for public safety. We have and will continue to tow vehicles that obstruct these areas.

Several vehicles parked at the National War Memorial this morning and were immediately towed. Cars are not allowed to park and people

will not be allowed to desecrate the Memorial.

Parking along 400 series highways and on/off ramps is prohibited and dangerous – vehicles parking on the ramps will be towed. Pedestrians are not permitted on highways at any time – people walking on the highways will be removed and may face charges. Parking and walking on overpasses create traffic safety risks - exercise caution and allow traffic to pass safely passing vehicles.

This event is having a substantial impact on traffic throughout the downtown area, highways and major arteries. Traffic in the downtown area has been severely impacted.

Do not travel in the downtown core.

We urge everyone to report threats or hate motivated incidents when they happen. If you see something suspicious, call police at 613-236-1222.

Police and the City of Ottawa will keep the public informed on city-wide traffic and transit. Follow the city's traffic management tool @Ottawa_Traffic for real-time updates or use a traffic monitoring app like Google or Waze to check for traffic congestion before you travel.

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Update 2: Weekend Demonstrations

Posted On Saturday January 29, 2022

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**FOR IMMEDIATE RELEASE: Saturday, January 29, 2022
7:55pm**

(Ottawa) – Crowds in the downtown core are dispersing after today's demonstration but traffic issues continue and a large presence of police remains in place.

There have been no incidents of violence or injuries reported.

Many streets in the downtown core are closed or impassable to vehicles.

Do not travel to the downtown core. For residents and businesses in the core, police are working to mitigate the impacts of the demonstration such as gridlock and parked vehicles and thank residents for their patience.

Police continue to work to ensure emergency lanes are maintained. Vehicles that are parked in areas deemed necessary for public safety will be towed.

Throughout the day, police and traffic officials were forced to close several interprovincial bridges and several 417 exits into Ottawa. These traffic issues will continue on Sunday.

Interprovincial bridges: Portage and Alexandra bridges are closed. Champlain bridge is open, and the Macdonald-Cartier bridge has lane reductions. The Chaudiere bridge is open for healthcare and essential workers only. Be prepared to show identification. If you are neither, do not use this bridge.

We continue to ask that demonstrators respect national symbols like the National War Memorial or the Terry Fox statue. City crews and police took steps to protect these areas, such as towing vehicles and removing signs and paraphernalia, but they should be respected at all times.

There will continue to be a large presence of police and to ensure public safety this evening and on Sunday.

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Update 3: Weekend Demonstrations

Posted On Sunday January 30, 2022

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**FOR IMMEDIATE RELEASE: Sunday, January 30, 2022
8:10am**

(Ottawa) Large crowds remained in the downtown core throughout the night and were actively managed by police. Officers encountered several challenges with demonstrators, including sporadic road blockages by trucks, which officers worked to clear.

These high-risk situations were de-escalated and resolved with no arrests.

Police are patrolling throughout the downtown core, managing the movement of protestors and trucks.

We are also responding to calls for service throughout the city.

The OPS and our partners continue to focus on keeping the peace in and around the demonstrations and maintaining emergency access lanes while addressing any threatening high-risk behaviour.

We continue to have a very large police presence today at all large demonstration locations. Please follow the directions of the police, emergency responders and City officials.

National monuments will be protected and should be respected by all. Barricades are installed to block any vehicular access to the path in front of the National War Memorial.

Do not travel to the downtown core. For residents and businesses in the core, police are working to mitigate the impacts of the demonstration, such as gridlock and parked vehicles. We thank residents and business owners for their patience.

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Update 4: Weekend Demonstrations

Posted On Sunday January 30, 2022

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FOR IMMEDIATE RELEASE: Sunday, January 30, 2022
2:00pm

(Ottawa)—This afternoon, a large presence of police continues throughout the downtown core and the movement of protestors and trucks continues to be managed. Emergency lanes are being maintained.

Priorities continue to include:

- Management of traffic issues (including gridlock);
- Keeping peace and order;
- Protecting monuments; and
- Addressing threatening and/or high risk behaviour.

This work is resource intensive, and police resources are fully stretched and fully engaged.

Public safety remains the top priority for police, City crews and emergency services.

Police and City staff are very aware of the complaints relating to parking, idling, noisemaking and other inappropriate behaviour. At this time, due to safety concerns, management of the protest and traffic must take precedence.

However, these matters are being responded to as soon as resources become available. Police continue to respond to calls for service throughout the city.

Throughout the remainder of the day and into the evening, focus will shift to implementation of egress and traffic approaches that move crowds and vehicles out of the downtown core. This will require a significant number of police and city resources.

Police have already begun working to facilitate the departure of individuals who are wanting to leave the area.

For more traffic information, view [City traffic video cameras](#), follow the city's traffic management tool @Ottawa_Traffic or use a traffic monitoring app like Google or Waze to check for traffic congestion before you travel.

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Update 5: Weekend Demonstration

Posted On Sunday January 30, 2022

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FOR IMMEDIATE RELEASE: Sunday, January 30, 2022
7:28pm

(Ottawa)— Throughout the weekend, the Ottawa Police Service and its partners have been actively and patiently managing a well-funded, major demonstration in the downtown core. We have seen multiple cases of disruptive, inappropriate and threatening behaviour from demonstrators.

Police are working with organizers to facilitate the safe departure of individuals and vehicles and to ensure safety.

Police are aware that many demonstrators have announced their intention to stay in place. This will continue to cause major traffic, noise and safety issues in the downtown core. We urge all residents to avoid travel to the core.

Police have avoided ticketing and towing vehicle so as not to instigate confrontations with demonstrators. Still, confrontations and the need for de-escalation has regularly been required.

Along with the safety issues, costs to businesses and social costs, the Ottawa Police continues to tally the financial costs of the policing costs which are estimated at more than \$800,000 a day.

If you work in the downtown core, please plan to work from home if possible.

Please adjust your plans in the downtown core. If your children attend school in the downtown area, please check with them to see if the school is open tomorrow.

Avoid travel into the downtown core tomorrow.

We are immensely proud of our police members and partners who have worked tirelessly to plan for and manage this demonstration over the past few days under difficult circumstances of extreme cold temperatures and difficult and challenging treatment from some demonstrators.

Public safety remains our number one priority.

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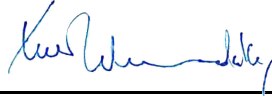
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Nur Muhammed-Ally, Counsel

Swastikas, other hate symbols displayed at Canadian protest against COVID mandates

Journalists say they were subject to hate speech and violence while reporting on 'Freedom Convoy' rally i

By **SHIRA HANAU**

30 January 2022, 8:22 pm



A demonstrator carries a US Confederate flag during the Freedom Convoy protest against COVID-19 vaccine mandates and restrictions, in front of the Canadian Parliament building in Ottawa, on January 29, 2022. (Dave Chan/AFP)

JTA — Swastikas and other symbols of hate were on display amid a sea of Canadian flags as part of the Canadian “Freedom Convoy” protests against vaccination mandates in Ottawa over the weekend.

The protests, which were organized by Canadian truckers in response to a vaccination mandate placed on truckers returning to Canada from the United States, took place Saturday and attracted thousands to Canada’s capital. The protests featured a range of groups comparing vaccine mandates to fascism and displaying Canadian flags, sometimes American flags, upside down. Many protesters held signs with profanity-filled messages for Canadian Prime Minister Justin Trudeau.

Among the symbols displayed at the protests were swastikas and, in at least one instance, the Confederate flag.

A member of parliament from the Conservative party, Michael Cooper, went out to show support to the protesters and was interviewed by a Canadian news channel, as a protester with a Canadian flag covered in swastikas was behind him.

Cooper later released a statement saying he did not know that the symbol was behind him and that if he had known, he would have condemned it. “He or she does not represent the thousands of peaceful protesters who waved Canadian flags,” he said.

flags and acted responsibly. I stand with them and will continue to fight with them,” he wrote in a statement to Twitter.

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Journalists who reported on the protests said they were subjected to hate speech and violence themselves, with a reporter for the Canadian Broadcasting Corporation being called a “slave blooded traitor” after asking for an interview with those organizing the protest.



Former US president Donald Trump gave the Canadian protesters a shoutout at a rally in Texas Saturday. “V those great Canadian truckers to know that we are with them all the way,” Trump said. “They are doing more to defend American freedom than our leaders by far.”

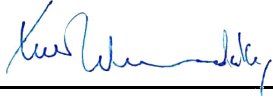
Bruce Heyman, who served as the US ambassador to Canada from 2014 to 2017, condemned the displays of hate symbols and other symbols of hate.

“Both the use of the swastika and the Confederate flag are symbols of extreme hate. So very sad to see these symbols anywhere and especially in Canada,” he wrote in a tweet.

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A handwritten signature in blue ink, appearing to read "Nur Muhammed-Ally", is written over a horizontal line.

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Chief Peter Sloly remarks during Media availability - January 31, 2022

Posted On Monday January 31, 2022

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FOR IMMEDIATE RELEASE: Monday, January 31, 2022 7:45pm

Chief Peter Sloly remarks during Media availability - January 31, 2022

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(Ottawa)—Good afternoon. I want to thank the Mayor and the Chair for their comments that preceded mine.

I want to provide you with an update since the last media session we held on Friday, before the commencement of the core of the demonstrations that arrived in the nation's capital.

At that last media briefing, you will recall that we described this as a unique demonstration. You heard some of those elements from chair Deans and Mayor Watson.

For those of you who live in Ottawa's downtown core, you have seen that materialize over the last four days.

Our frontline officers and civilian members or partners from national, provincial and municipal agencies have experienced the same thing.

This demonstration is unique in nature, massive in scale, polarizing in context and dangerous in literally every other aspect of the event itself.

This started on the West Coast of Canada and spread across the country. It has been fluid, ever-changing and increasingly more

difficult to manage. That has remained since the beginning; it continues to this current day.

I want to provide you with the updated information, from the course of events that took place through Friday afternoon into Saturday, Saturday evening into Sunday, Sunday evening into Monday.

As we talked about on Friday, the ingress of thousands of vehicles, particularly heavy trucks, caused almost immediate traffic gridlock through Friday into traffic chaos on Saturday and Sunday.

As we told you on Friday, the ingress level of vehicles and demonstrators would make large areas of the downtown core as well as the access routes in and out of the city, bridges, 400-series highways, and major thoroughfares difficult to navigate for pedestrians, cyclists and motorists of any kind.

It would create situations, pockets of dangerous areas for people to travel through.

It will require our residents and our businesses to get updated information from ourselves or city partners and other agencies around the current state of issues and risks and make informed decisions for the safety of themselves, their families and their businesses.

For the most part, the people who have been directly affected have been incredibly patient, incredibly resilient, and they have suffered a lot. I would like to recognize those people who live, work or need to commute through the downtown core of Ottawa. They've been incredibly and negatively impacted by the course of demonstrations and the impact of those demonstrations on their lives and livelihoods.

We are incredibly concerned about the stress they've been under, not just in the last several days but in the last months and years of the pandemic. We're very much aware of this. We're doing everything possible to mitigate those impacts against individuals, families, and businesses.

At the same time, I need to let everyone know of the incredible level of bravery, compassion, professionalism and dedication of all Ottawa Police Service members, all of the partner agencies that have joined us here in the last four days, all of our partners at the City of Ottawa and anyone who's played any direct role in supporting the operations around this demonstration. They have been an incredible group of individuals who kept this city safe during a situation that could have become riotous, it could have led to significant and severe injuries, and it could have led to the loss of lives.

None of that has occurred over the last four days. Let me repeat.

No injuries, no deaths, no riots in the last four days in the nation's capital, even though we have a global cause, national protest.

Tens of thousands of individuals from a wide variety of causes gathered to actively demonstrate 24 hours a day for the last four days. All of that, coupled with thousands of heavy trucks, SUVs and cars driving into the city and congregating in the core of this city, 24 hours a day for four days a week.

I want to specifically thank the following agencies who have come from the federal, provincial and municipal levels: The RCMP, Ontario Provincial Police, Gatineau Police, le Sûreté du Québec, London Police Services, Hamilton Police Services, Peel Region Police Services, Toronto Police Services, York Region Police Services and Durham Region Police Services.

They have sent members of their organization with experience and expertise, professionalism, compassion and joined under our Incident Command System. They have provided very needed, timely, professional, and effective services to keep this city safe. To keep our community safe. To keep our residents safe. To keep our city workers safe. To maintain emergency routes for fire, ambulance and police. To ensure the safety of our health care centers, hospitals or vaccination clinics. To ensure as much as possible the continuation of business within the city and the lifeblood of the city in terms of our ability for our residents to receive emergency services.

There were reports of denial of service—injuries and trauma-related directly to the demonstration. I can tell you that is not true. We have verification from ambulance services, fire services and police services that while there were delays in responses and, in some instances, gaps in services delivery, nobody was directly affected regarding ambulatory service requirements or emergency services requirements. Despite the massive traffic chaos and gridlock that we saw, not just in the core but on our major access ingress routes in the bridges to 400 series highways, that is an incredible level of coordination and professionalism that was demonstrated over the last four days.

Going forward, I want to be clear: public safety remains our paramount priority. The safety of our residents, our businesses, our visitors, our partners, our service members and yes, the safety of all those who have chosen to come here to demonstrate whether they live in the city or they've come from other locations across the country.

Effective tomorrow, we are re-deploying our Market Neighborhood Resource Teams, our Centretown Neighborhood Resource Teams, and our crime prevention officers back into their neighbourhoods, the Market, Lowertown, Sandy Hill, and into Centretown. Their jobs will be to provide direct support services, safety services, and customer service to the residents, business owners, the not-for-profit sector, and the service providers in and around the core. Unfortunately, we needed those officers over the last four days. Every single one of those officers was deployed fully and continually. They are tired, they're stressed, and they're strained, but every one of them knows the stress and strain that was imposed upon their communities, and they're going back to serve and protect those communities effective tomorrow.

The situation of the demonstration has scaled down over the last 12 hours. Let me repeat - the situation of the demonstration has scaled down over the last 12 hours. We want that trend to continue until this demonstration comes to a complete end. I cannot guarantee you that right now. Still, I can guarantee you that every effort that negotiation and coordination, de-escalation has continued throughout the last four days and will continue until the complete end of this demonstration.

We will maintain a large contingent of our neighbourhood and crime prevention officers in the immediate communities around where the core demonstrations are taking place to provide greater services, a greater sense of safety and greater interactions with those who've been most affected.

Within the next 24 hours, we will be creating a hotline for hate incidents hate crimes. Any offence directly related to the demonstrations, including criminal offences, threats, assaults, hate-related crimes and mischiefs. Anything that any member of the Community, visitor and demonstrator has faced in terms of criminal activity, a hotline will be established to receive those reports. There will be an immediate and continuous investigation until we have resolved it through charge and prosecution.

We have continued our relationship and working relationship with the Crowns Office. We have intelligence officers, investigative officers, and multi-jurisdictional support from British Columbia to Saint John's. From Nunavut to the GTA. To make sure that no matter where you live, no matter where your vehicles are registered, if you've come here and committed a crime. If you have committed a hate crime, you will be investigated. We will look for you. We will charge you, if necessary, will arrest you, and we will pursue prosecutions against you.

We have several active criminal investigations undergoing from bribery to threats to assault to the dangerous operation of vehicles. They will continue. Please report to us any other matters that we are not aware of.

We've had meetings throughout the last 24 hours. I had calls with the mayor, the chair, council members who represent the wards in the immediate area of the demonstration sites. We have had meetings with the City Councillor, City Legal. Today, I've had direct meetings with Commissioner Brenda Lucki, Commissioner Tom Carrique of the Ontario Provincial Police, their executive staff, and operational leads in the National Capital Region. We have continued to request levels of resources and support from our partner agencies federally, provincially and municipally. They have all been generous in providing those resource requests. They are continuing to support us as we go forward.

We continue negotiations with the core organizers of the core protests. We are emphatic in our desire to resolve these demonstrations as quickly, safely and effectively as possible. That will continue until the very end.

All options. All options are on the table. Through negotiation, through to enforcement. All options remain on the table to safely and effectively resolve this demonstration.

We will work in full coordination with the City of Ottawa. My thanks to Steve Kanellakos and his amazing team. You're going to hear from Kim Ayotte yet very shortly.

As we have done from the first day, we're going to work in full cooperation with our federal, provincial and municipal policing partners, national security agencies, and other public sector agencies. We will do so to the last day.

Let me repeat. Public safety has been paramount from the very beginning of this operation. We have had four dangerous, difficult dynamic days of 24 hours a day operations in frigid temperatures, minus 25 - 30 degrees. Our officers work 12/14/18 hour days in the cold with extremely dangerous and dynamic situations.

There were 1000 potential flashpoints that could have resulted in rioting, injury, or death. They did not occur. We kept this city safe. We kept our community safe. We kept our partners safe. We kept our members safe.

I'm indebted to the professionalism and the duty to serve and protect of our members of the Ottawa Police Services and the partner

agencies. I'm indebted to the resilience of our residents, our business owners, our visitors, our employers, our employees.

This has been a whole of service effort. It's been a whole of city effort and, to a degree, a whole of country efforts. So far, we've been successful. We take nothing for granted. We are making progress. Real progress. We've reduced the size of the demonstration significantly will continue to do so in the hours and days ahead.

Your patience is necessary; your support is appreciated. Your resilience is amazing.

I thank you very much. My team is here to answer any questions. Deputy Chief Bell from an investigations Intelligence standpoint, Deputy Chief Ferguson from an operational standpoint, I will remain until all questions are asked. We'll provide the best and most up-to-date information for you and the media.

I thank Mayor Watson, chair Deans, and Council for your support. Steve Kanellakos and the team at the City of Ottawa for their support. I will turn things back over to the moderator now. Thank you.

-30-

*To view the full City of Ottawa and Ottawa Police virtual Media briefing from this afternoon, please visit the City's YouTube page:
<https://www.youtube.com/watch?v=6XISC52IOjo>*

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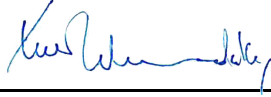
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Downtown Ottawa residents describe stress and anxiety of living with ongoing trucker protest



Centertown residents don't feel safe



Businesses stay shut by

**Leah Larocque**

CTV News Ottawa Multi-Skilled Journalist

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Published Jan. 31, 2022 6:59 p.m. EST

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A Centretown man says he was assaulted by demonstrators while trying to take pictures in Confederation Park on Monday.

Tim Abray has lived in the Centretown area for a decade but described the past four days, as “pretty challenging.”

Abray says he decided to go for a walk on Monday around noon. “I took a walk down the (Queen Elizabeth) Driveway to see how many trucks were still here.” When he got to Confederation Park near the National Arts Centre entrance he says, “I was asked to leave.”

He describes the next moments after being approached by demonstrators.

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“They asked me if I was a supporter or not, and I said I was just here having a look and that I live in the neighbourhood. They told me to leave, and I said, ‘I don’t think so, this is where I live and anyone is allowed in the park,’ and he physically grabbed me and removed me from the property,” he says.

Abray says [he still had his video recording at the time](#).

“I immediately went and spoke to police officers onsite,” says Abray. “It is clear they are not interested in a conversation, they are interested in a confrontation, and this is what we have been living with all weekend.”

Abray says he is not interested in pressing charges.

Stress and anxiety for downtown residents

Residents who live in Centretown describe the past four days as extremely loud, frustrating, and stressful.

Sarah Mack lives in Centretown and says it has been constant gridlock outside her apartment all weekend and into Monday. She says she has trouble concentrating and working from home.

“It has been nothing short of a nightmare. They were setting off fireworks all throughout the night. It was getting dangerously close to my windows.”

Mack says her cat has also been stressed and has thrown up because of anxiety. Mack says she has also been verbally assaulted by some demonstrators.

Mack says with no end in sight to the protests, she is making plans to leave. “I am exhausted. With this having no sign of ending at any point I don’t know what I am going to do, what choice I have but to leave the area.”

There are community Facebook groups that are trying to help residents get supplies. Laurena Nash says, “We are organizing trying to get parents noise cancelling headphones for their babies, or noise cancelling devices for rescue pets who have lots of anxiety...we are trying to do what we can because there is a lot of anxiety and stress out there.”

Other residents telling CTV News Ottawa that some people have not being able to get groceries or leave their homes because of safety concerns.

Meanwhile, police continue to ask residents to be patient. Ottawa Police Chief Peter Sloly says Neighbourhood Resource Teams will be back in neighbourhood on Tuesday.

“Our commitment is to redeploy uniformed members, our neighbourhood resource teams, that were previous deployed into the Market area, Lowertown, Sandy Hill, Centretown communities, redeployed out of the operational demonstration command centre that we have had for the past five days.”

Sloly says the officers will help residents feel safe. “Their primary duties and focus is to create a sense of confidence and safety of those communities. And those are the communities that have been the most directly and negatively affected over the last five days.”

Sloly says the police services goal is, “as quickly as possible we will try to return this city to a sense of normalcy.”

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Ottawa resident Tim Abray says he was physically assaulted in Confederatio pictures. (Leah Larocque/CTV News Ottawa)

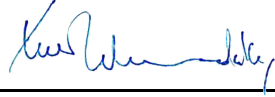
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Soft police approach to Ottawa anti-vax protest reveals 'pure racism' say critics

Brett Forester (<https://www.aptnnews.ca/author/bforester/>)

Jan 31, 2022

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Horns, swastikas and mocking First Nations drumming mark anti-vaccine mandate rally on Parliament Hill



The mild-mannered police response to the weekend blockade of downtown Ottawa by thousands of protesters opposed to pandemic restrictions reveals a racist double standard in how law enforcement agencies treat civil disobedience, some observers say.

Had Indigenous activists made the same threats, broke the same laws, and engaged in the same level of disruption they'd probably be met with a heavy-handed crackdown, Mi'kmaw lawyer and professor Pam Palmater told APTN News.

"I have no doubt that this is pure racism involved," said Palmater. "Are people allowed to threaten the life of the prime minister? I'm wondering about that because I guarantee you if that was an Indigenous person or a Black person, they'd be sitting in jail."



(<https://www.aptnnews.ca/wp-content/uploads/2022/01/HOC-LOOK-AHEAD-WEB-1.jpg>)

Police officers in the middle of a crowd gathered to protest vaccine mandates, lockdowns and other measures. Photo: APTN

The convoy of rigs, campers, flat-bed trucks and cars converged on Parliament Hill causing traffic chaos and prompting Ottawa police to issue a no-go directive for the city centre.

But before that, police tweeted out a creative graphic with a truck on it saying, “We respect the rights of our communities to speak out. Our role as a police service is to provide a safe space for people to grieve and be heard.”

Unmasked demonstrators proceeded to cause a ruckus in local businesses, desecrate monuments and reportedly harass a local homeless shelter in search of food while filling the normally quiet capital city air with incessant horn blaring and gas fumes.

This video was sent to APTN News on Facebook by a convoy supporter who was talking to an Ottawa police officer.

00:23



Social media users shared images of flags bearing icons of fascism, white supremacy and hate including Nazi swastika and confederate flags that garnered shock, horror and outrage.

Video also circulated showing demonstrators appropriating First Nations drumming as they danced, drank beer and chanted “yaba daba doo” and “f—ck Trudeau.”

The drum is a sacred ceremonial item whose handling is governed by specific cultural protocols. Some are decrying the episode, which happened only steps away from the Centennial Flame where throughout the summer stood a memorial to residential school victims, as an insult.

“I am disgusted, appalled and saddened,” tweeted Sen. Brian Francis, who is Mi’kmaw from P.E.I.

(<https://sencanada.ca/en/senators/francis-brian/>), in reaction to the video. “This blatant act of racism must be vehemently condemned by all. Drumming is sacred to all First Nations. Our ways of life should never be mimicked, mocked and appropriated for political or other gain.”

Senator Brian Francis 
@BrianFrancisPEI



I am disgusted, appalled and saddened. This blatant act of racism must be vehemently condemned by all. Drumming is sacred to all First Nations. Our ways of life should never be mimicked, mocked and appropriated for political or other gain.

André Bear @Napeykan

#FreedomConvoy2022 desecrating our drums and songs yelling “yaba daba doo” to pretend like they have support from Indigenous

Prime Minister Justin Trudeau took a similar tack when addressing the nation at noon after he tested positive for COVID-19. The group’s fierce anti-Trudeau sentiment was palpable with rhetoric ranging from the “f—ck Trudeau” signs and chants to suggestions he should be murdered and his government overthrown

be murdered and his government overthrown.

Trudeau previously condemned the convoy as a “fringe” minority and took the opportunity Monday to dig in. He skirted the rancour directed at him, blasting instead the racism and rowdiness while urging others to stand up to fascism and hate.

“Freedom of expression, assembly and association are cornerstones of democracy,” he said in a virtual press conference. “But Nazi symbolism, racist imagery and desecration of war memorials are not. It is an insult to memory and truth. Hate can never be the answer.”

Watch the APTN National News interview with Brett as he talks about the police response to this protest:

03:34



With the House of Commons resuming Monday, Trudeau also seized the opportunity to accuse his chief political opponents of peddling misinformation and tinfoil-hat conspiracy theories that fan the flames of social disunity.

“I think (Conservative Leader) Erin O’Toole is going to need to reflect very carefully on how he’s walking a path that supports these people who do not represent truckers, let alone the vast majority of Canadians,” said Trudeau.

The Canadian Trucking Alliance has distanced itself from the movement, issuing a statement last week calling the convoy misguided and pointing out the vast majority of truckers have been inoculated.

But O’Toole met with truckers on Jan. 28 as they began filtering into the city. “I support their right to be heard, and I call on Justin Trudeau to meet with these hard-working Canadians to hear their concerns,” O’Toole tweeted.

The position represents a flip flop for the Tory leader who, at the

height of the Wet'suwet'en solidarity blockades, said, "Blockades are not protests — they are an attack on the freedom of Canadians to live their lives and travel freely through their own country."

Palmater said there is a blatantly hypocritical double standard here too.

"It proves that those pieces of legislation and those policy initiatives are racially motivated," she said. "It's OK if angry white men do it because they are politically aligned with you, but it's not OK if Indigenous people peacefully protect their own rights."

Palmater also worried law enforcement agencies aren't taking seriously the national security and public safety threats posed by hate groups who successfully latch on to legitimate public policy issues.

Fareed Khan, founder of Canadians United Against Hate, offer similar take. He flagged "the potential danger of this movement to Canada's political stability and to peace-loving Canadians, with its manifesto calling for insurrection and an overthrow of the government."

He told the Canadian Press protests led by Black, Indigenous or people of colour have faced much harsher opposition for causing far less disruption.

"This smacks of racism and white privilege," he said. "If you had a Muslim, or a brown person, or an Indigenous person who organized such an event and called for unseating the government of this country, security forces would have been down on them like a bag of hammers."

Water Fraser Needham's story on what is in store during this session of Parliament:

02:17



—With files from the Canadian Press

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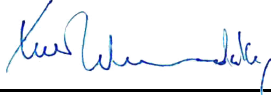


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Two arrests in demonstration-related investigations

Posted On Tuesday February 01, 2022

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FOR IMMEDIATE RELEASE: Tuesday, February 1, 2022 8:45pm

(Ottawa) – Today, the Ottawa Police Service arrested and charged Matthew DORKEN, 29 year old, of Ottawa, with Mischief under \$5000. On January 29th, a man caused mischief to property. He was not arrested at the time in order to avoid a larger confrontation.

On January 30th, Andre J LACASSE, 37 year old, of Ottawa, was charged with Carry a Weapon to a Public Meeting under the Criminal Code of Canada.

With respect to the demonstration, the Ottawa Police is reporting:

- 13 active investigations;
- Eight complaints to our hotline, three of which will be investigated by our Hate and Bias Crime Unit;
- Two men charged with criminal offences;
- Some progression in the investigation into the desecration of the War Monument;
- A reduction in demonstrators - 50 people on Parliament Hill and another 200 people are gathered nearby.

We want to be very clear, both for the current demonstrations and any planned demonstrations: Illegal activity will not be tolerated.

There will be consequences for anyone contravening City By-laws, Highway Traffic Act and Criminal Code legislation.

- 30 -

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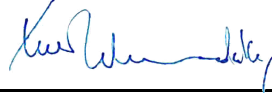
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Ottawa to establish hate incident hotline amid reports of racism and anti-Semitism during protests over Covid-19 mandates

By Raja Razek and [Chris Boyette](#), CNN

🕒 Updated 3:58 AM ET, Tue February 1, 2022



World



Thousands in Ottawa protesting Covid-19 mandates 02:50

(CNN) — A hotline for people to report hate incidents is being set up in Ottawa as the Canadian capital grapples with [ongoing protests](#) over Covid-19 mandates that police say have led to reports of threatening, illegal and intimidating behavior by the demonstrators, rattling downtown residents and workers.

"We already have a number of hate-related incidents that we're investigating," Ottawa Police Chief Peter Sloly said at a video news conference Monday announcing the hotline. "We encourage anyone who's been the victim of a hate crime or think they may have been the victim of a hate crime or exposed to hate incidents to contact us."



World



Related Article: Truckers and protesters against Covid-19 mandates block a border crossing. Others tried to take meals away from the homeless in Ottawa, shelter says

The hotline, which is expected to be active within 24 hours, will field reports of criminal activity, threats, assaults and hate-related crimes, "directly related to the demonstrations," Sloly said.

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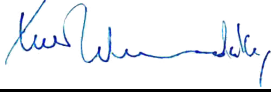
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Local News

Ambulances pelted with rocks during protest; health workers, patients face added stress, delays

Throughout the weekend and into Monday, many health workers had difficulty getting to work, as did some patients who were trying to reach hospitals.

Elizabeth Payne

Feb 01, 2022 • February 1, 2022 • 4 minute read



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Paramedics in downtown Ottawa on Monday. PHOTO BY TONY CALDWELL /Postmedia

Paramedics asked for police escorts over the weekend after at least two ambulances were pelted with rocks and protesters who appeared to be part of the truck convoy yelled racial slurs at one paramedic when he got out to check for damage.

STORY CONTINUES BELOW

The paramedic was shaken, said Jocelyne Marciano, operations commander for the Ottawa Paramedic Service. Those paramedics assigned to work on foot among the chaotic crowds that converged around Parliament Hill on the weekend felt unsafe, she said.



In addition to throwing rocks, she said some apparent protesters were belligerent and tried to slow ambulances down.

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Once paramedics got a greater police presence around their vehicles and escorts for those on foot, things improved, she said.

Paramedics were not the only front-line health workers who dealt with fallout from the “Freedom Convoy” protests, which drew thousands of people and trucks into Ottawa during the weekend, some waving symbols of hate, including swastikas and Confederate flags. Many of those protesters and their trucks remained on Wellington Street near the Parliament Buildings on Monday as police worked to de-escalate the situation and bring the protest to an end.

STORY CONTINUES BELOW

Throughout the weekend and into Monday, many health workers had difficulty getting to work, as did some patients who were trying to reach hospitals. Montfort Hospital said it was particularly concerned about expectant mothers heading to hospital to give birth.

As Ottawa residents were becoming increasingly fed up with the disruptions, noise and intimidation associated with the protests, health services and vaccine clinics in the city core remained closed Monday into Tuesday.

Doors at the Centretown Community Health Centre on Cooper Street were locked Monday, although the clinic provided some services.

Director of primary care Lynsey James said staff members were concerned about vulnerable clients who use the clinics for drop-ins and a number of services. She said clients living in the neighbourhood have told staff they felt besieged, were afraid to leave their homes and unable to sleep because of the honking. One client of the clinic told staff he was harrassed by protesters outside his home.

STORY CONTINUES BELOW

Wendy Muckle, executive director of Inner City Health, said staff members are seeing more behavioural issues and more drug and alcohol abuse among clients reacting to the noise and chaos of the protests.

She said a nurse working for Inner City Health had been unable to sleep because of the noise outside in the ByWard Market and had to take time off work.

For many health workers across the region, the unprecedented protest has made an already difficult

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Many struggled to get into work, while others extended their shifts to wait for staff delayed in traffic.

Some health workers stayed overnight in rooms near the hospitals where they work because of the difficulty getting back and forth to work over jammed or closed bridges. Others waited long hours in traffic to get to work and at least one emergency physician reportedly ditched his car on a gridlocked interprovincial bridge and walked an hour-and-a-half to his hospital job.

STORY CONTINUES BELOW

CHEO president and CEO Alex Munter said a family with a baby heading to CHEO from Quebec was unable to make it across the bridge and went, instead, to an emergency department in Gatineau.

Like other hospitals, CHEO kept staff members informed of the traffic situation on bridges between Ottawa and Gatineau during the weekend, and helped those having difficulty by offering hotel rooms and paying for some Quebec-based staff to take the Cumberland ferry instead of dealing with traffic tie-ups.

Medical student Jennifer Horwitz tweeted that she headed home after her shift at CHEO and was unable to get to her downtown apartment because of the protests. “My apartment is completely inaccessible from any direction. Glad to see this is what freedom looks like!” she said.

STORY CONTINUES BELOW

Munter said he reached out to her after seeing her tweet but she had already found alternate accommodations.

Munter added that many staff members living in the centre of Ottawa felt “besieged” and he heard from many with concerns about symbols of hate displayed by some participants.

“I share the concerns I’ve heard from many CHEO staff, particularly those who are Jewish, LGBTQ+ or members of minority communities. Swastikas and other symbols of hate have no place in our community. It is time for the protesters to go.”

On Monday, The Ottawa Hospital told staff and patients to expect traffic delays and plan accordingly. It said it has a limited number of rooms in the residence next to the Civic campus for staff working consecutive days and having trouble getting in.

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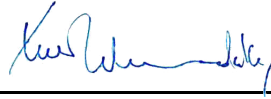
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OTTAWA | News

Some residents in downtown Ottawa standing up to the trucker convoy



Marika Morris says she and some of her neighbours stood on the street to stop the "Freedom Convoy" protesters from continuing to drive around their neighbourhood. (Photo courtesy of Marika Morris)



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Published Feb. 1, 2022 5:56 p.m. EST

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Marika Morris lives in a residential area near Metcalfe Street in Ottawa's Centretown neighbourhood. She says for the past three days, there have been two columns of trucks, back-to-back, taking up two of the three lanes.

“This isn’t right,” says Morris. “They’ve taken over our streets. They’ve taken over where we live, where we work, where we study.”

She says the trucks have been circling her streets blaring their horns. On Tuesday, Morris and her neighbours had enough and stood outside in the middle of the road blocking the convoy from moving. Morris giving them a thumbs down each time they blew their horn at her.

“It was just a spur of the moment thing actually,” says Morris. “We just went out into the street. They were coming really slowly, honking, with a line of people behind them honking. They were blocking all access to any emergency vehicles. They literally don’t care whether we live or die.”

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Morris says residents in the area feel trapped inside their homes, afraid to go outside, and seniors in the area are not able to have their prescriptions dropped off because delivery vehicles can’t get around the trucks.

“At night, there’s drunken yelling,” says Morris. “And they come and they defecate just under our balconies. It’s

beyond unpleasant, it's really out of bounds. And there doesn't seem to be anybody enforcing the law."

Ottawa police chief Peter Sloly says "all options are on the table" when it comes to ending the demonstration and returning the city to a sense of normalcy, but he said the police service's ability to enforce the law has been hampered by the "large size, dynamic and dangerous nature" of the demonstration.

The Ottawa Police Service has set up a dedicated hotline to report any criminal activity related to the demonstration. So far, 12 active investigations are underway into various allegations, including bribery, threats, assault and dangerous driving.

Hate-motivated incidents can be reported to 613-236-1222 ext. 5015. Other crimes can be reported to 613-236-1222 ext. 7300.

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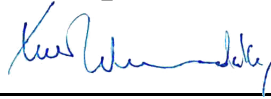
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Alberta RCMP statement regarding Coutts border assembly

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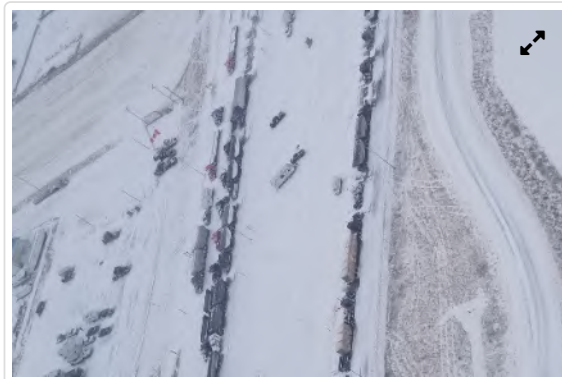
News release

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The Alberta RCMP continue to act to preserve the peace and maintain public safety at the Coutts border crossing.

What may have begun as a peaceful assembly quickly turned into an unlawful blockade. While the Alberta RCMP has been in a position to conduct enforcement, we have been engaged with protesters at the Coutts border crossing in an effort to find a peaceful and safe resolution for all involved. We thought we had a path to resolution, the protesters eventually chose not to comply.

As of this morning, further action is being taken by the Alberta RCMP as this blockade continues to impede the ability for emergency agencies to provide full services to area residents. It has also negatively impacted the flow of goods and services, and impedes the public's freedom of movement.

A Highway is considered essential infrastructure. It is unlawful to wilfully obstruct, interrupt or interfere with the construction, maintenance, use or operation of any essential infrastructure in a manner that renders the essential infrastructure dangerous, useless, inoperative or ineffective as per the Critical Infrastructure Defence Act of Alberta. Anyone who actively blocks a highway—or aids, counsels or directs a highway to be blocked—may be subject to arrest and charge under this act.

Person's participating in this blockade can also expect enforcement of any contraventions of the Criminal Code of Canada, the Traffic Safety Act and Use of Highway and Rules of the Road Regulations at this location and area roadways.

The Alberta RCMP uses necessary measures to protect the fundamental freedom of peaceful assembly and freedom of expression, to promote the safety of all citizens, to enforce laws and to maintain peace and order. In turn, it must be recognized that while everyone has a right to peaceful freedom of expression; the general public, local residents and businesses also have the right to a safe environment and freedom of movement. This event is not a peaceful assembly.

Alberta RCMP would like to advise that commercial vehicles should contact Canada Border Services Agency for further information regarding border crossings.

–30–

Contact information

Alberta RCMP Media Relations
780-509-3970

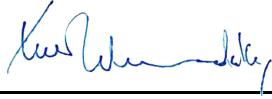
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Violence reported at Coutts as RCMP attempt to break up blockade

'This kind of conduct is totally unacceptable ... Without hesitation, I condemn those actions and I call for calm,' said Kenney

Jason Herring
Feb 01, 2022 • February 1, 2022 • 6 minute read • 196 Comments



Anti-mandate demonstrators gather as a truck convoy blocks the highway the busy U.S. border crossing in Coutts, Alta., Monday, Jan. 31, 2022. PHOTO BY THE CANADIAN PRESS/JEFF MCINTOSH

Violence broke out at an illegal blockade at the Coutts port of entry Tuesday after RCMP moved to begin enforcement action against participants, according to Premier Jason Kenney.

STORY CONTINUES BELOW

“I’ve received reports in the last hour of people aligned with the protesters assaulting RCMP officers, including one instance of trying to ram members of the RCMP, later leading to a collision with a civilian vehicle,” said Kenney.



“This kind of conduct is totally unacceptable . . . Without hesitation, I condemn those actions and I call for calm.”

RCMP were not immediately available to comment on the assaults.

The blockade, which has halted traffic through the busy U.S. border crossing in a protest of COVID-19 health measures, is in its fourth day.

Mounties moved to enforce the law Tuesday after negotiations broke down with protesters, who began the blockade Saturday. Some vehicles left the protest, but RCMP reported other protesters breached a police barrier to join the blockade, with two of those in tractors sporting Canadian flags racing down a ditch along the highway to join the demonstration.

STORY CONTINUES BELOW

“We (began) to remove some vehicles from the protest area. A few left. I didn’t get an exact count of how many went out. And then we received notification that additional protesters were arriving on the scene and came around our secured area,” RCMP Cpl. Curtis Peters told The Canadian Press.

Peters said he didn’t know how many additional vehicles entered the blockade, or what would come next.

Semi-trucks, camper vans and farm equipment are among the vehicles dotting Highway 4 south of Lethbridge. RCMP said Monday night negotiations had broken down with protesters. They said those blocking the highway or aiding the blockade may be arrested or charged under Alberta’s Critical Infrastructure Defence Act.



GOOGLE MAP

DARREN FRANCEY / POSTMEDIA

“We have been engaged with protesters at the Coutts border crossing in an effort to find a peaceful and safe resolution for all involved. We thought we had a path to resolution, the protesters eventually chose not to comply,” RCMP said in a news release Tuesday afternoon.

STORY CONTINUES BELOW

“What may have begun as a peaceful assembly quickly turned into an unlawful blockade . . . This event is not a peaceful assembly.”

Speaking at a Tuesday news conference, Kenney said many “very well-intentioned” protesters have opposed vaccine mandates in recent days, but he condemned what he characterized as “a small number” of people who took part in the Coutts border blockade.

He said those involved must stop “this unlawful conduct” and find alternative, legal forms of protest.

“I call for calm amongst anybody who feels sympathetic for those engaged in this blockade. Please stay away from the area. Please do not further intensify an already difficult situation,” Kenney said.

The premier said he would not meet with the protesters, particularly as enforcement is underway.

STORY CONTINUES BELOW

Many RCMP officers and provincial sheriffs are at the blockade, talking with demonstrators, and an RCMP helicopter is also flying overhead. Mounties said the blockade is impeding emergency vehicle access to the Village of Coutts, which has a population of approximately 250.

They said those participating in the blockade could also be subject to charges under the Criminal Code of Canada and the Traffic Safety Act. The Mounties added that while Albertans have the freedom of peaceful assembly, “the general public, local residents and businesses also have the right to a safe environment and freedom of movement.”

A convoy of trucks and other vehicles is blocking traffic on Highway 4 near the Coutts border crossing. PHOTO BY JAKE ZACHARIAS /supplied

Calgary lawyer Chad Williamson said he has been retained by a group of the protesters to provide legal support and assist with negotiation with RCMP. He said his goal is to de-escalate the situation and open up “lines of productive dialogue” with law enforcement.

STORY CONTINUES BELOW

“The protesters are demanding an end to the COVID lockdown mandates in their various forms, as they relate to the (chief medical officer of health) orders under the Public Health Act and the vaccine passport,” Williamson said.

“Our hope was to either establish a dialogue or reopen a dialogue in attempts to bring the parties closer together.”

The Opposition New Democrats called Tuesday for the province to immediately seek an emergency injunction through the Court of Queen’s Bench to put a stop to the blockade.

“I’m certainly not going to be telling police, nor should any other politician tell the police how to implement their enforcement actions,” NDP transportation critic Lorne Dach said. “What I’m asking for is the premier to apply for an injunction that will, if successful, allow the police to rely upon that injunction.”

STORY CONTINUES BELOW

Kenney said his government was prepared to seek an injunction but that it was not a necessary step for police to begin enforcement.

Anti-mandate demonstrators gather as a truck convoy blocks the highway near Coutts. PHOTO BY THE CANADIAN PRESS/JEFF MCINTOSH

The border blockade is also drawing criticism from elected officials at the municipal and federal levels.

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Calgary Mayor Jyoti Gondek said Tuesday she's "incredibly concerned" about the blockade.

"This is no longer a protest. This is disruption of the economy. It's disruption of basic life," Gondek said in an interview before RCMP announced enforcement action. "So I'm interested in why the parties that have the power to stop this and charge people aren't doing so."

STORY CONTINUES BELOW

Meanwhile, the federal Liberal party's sole Calgary MP is calling on the UCP government to "immediately address" the blockade to reopen trade through the border crossing.

"This blockade must end before it does further damage to our economy," Calgary-Skyview MP George Chahal said on Twitter. "Some of the hard-working truck drivers who are currently keeping our supply chains intact are stranded south of Coutts right now."

The truck convoy has blocked the highway since Saturday. PHOTO BY THE CANADIAN PRESS/JEFF MCINTOSH

Alberta trucker Sam Chahal was stuck in Sweetgrass, Mont. — the community on the other side of the U.S. border from Coutts — on Tuesday. He said truckers are being told to travel to other ports of entry, but that nearby crossings don't allow for commercial vehicles, making a detour a time-consuming and costly endeavour.

STORY CONTINUES BELOW

“(We’ve) been working on the front lines since the very start of the pandemic. We’ve sacrificed a lot during this time,” Chahal said. “We’ve been burning our fuel. We’re wasting our time and we’re not getting our jobs done on time. Fully-loaded trucks are still not allowed to cross the Coutts border.”

Mark W. Hanson, the Sweetgrass port director, said anyone trying to enter Canada at the Coutts entry is currently unable to pass through.

He said the Sweetgrass port remains operational but that southbound traffic has been limited due to the blockade.

“We are suggesting utilizing a different port of entry, either to the east or the west of the Sweetgrass-Coutts crossing to avoid that situation,” Hanson told Postmedia on Tuesday.

STORY CONTINUES BELOW

The Sweetgrass crossing into the U.S. processed an average of about 371 trucks and 394 passenger vehicles per day in December 2021, Hansen said, adding traffic at the border is down during the pandemic.

The Alberta Motor Transport Association, the industry group representing the province’s commercial transportation industry, declined to comment Tuesday, saying the current situation is the responsibility of law enforcement, government and border officials.

The Coutts protest is in support of a convoy of trucks that arrived in Ottawa on Friday to demonstrate against requirements from both the Canadian and U.S. governments that truckers must get a PCR test and quarantine when crossing the border if they are not fully immunized against COVID-19. Kenney continued to advocate Tuesday for a quarantine exemption to be reinstated for unvaccinated truckers.

STORY CONTINUES BELOW

UCP backbencher Grant Hunter has faced heat after attending the Coutts protest with his family Saturday, with the NDP calling for his removal from caucus. In a statement to Postmedia on Monday, he confirmed his participation in the protest but asked those in the blockade to let traffic pass.

Kenney has yet to address Hunter's attendance at the rally, but Jobs, Economy and Innovation Minister Doug Schweitzer said Monday the UCP caucus would need to make a decision about whether Hunter's actions merit removal from caucus.

— With files from Madeline Smith, Michael Rodriguez and The Canadian Press

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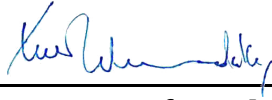
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OTTAWA

Truck convoy costs Ottawa's busiest mall millions in lost revenue

**Leah Larocque**

CTV News Ottawa Multi-Skilled Journalist

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Published Feb. 2, 2022 6:12 p.m. EST

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The Retail Council of Canada estimates the seven-day closure of the Rideau Centre could cost the downtown Ottawa mall \$19.7 million in lost revenue.

The CF Rideau Centre will remain closed until at least Feb. 6 as the "Freedom Convoy" protest continues in downtown Ottawa.

Michelle Wasylyshen with the Retail Council of Canada says retailers understand why the mall is closing, "Everybody wants employees and customers to be safe."

"We understand why they have chosen to close down. Everyone has the same goal which is the protection of employees and customers," Wasylyshen says.

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- Ottawa's Rideau Centre mall to remain closed until Feb. 6 amid convoy protest

"Retailers and store owners are working towards the same goal – it is concerning for everyone- retailers just want to get back to serving their customers."

According to the council, CF Rideau Centre is the fourth busiest shopping centre in Canada, with 28.1 million annual visitors.

"COVID by its very nature is unprecedented, retailers are grappling with a lot right now, whether it is labour shortages, supply chain shortages, and all of that is unprecedented by its very nature. So, this is just one more thing to add to the mix, so this is very concerning for sure," Wasylyshen says,

The Rideau Centre has been closed since Saturday, after it was packed with maskless protesters during the first day of the truck convoy and protest in downtown Ottawa.

"CF Rideau Centre will be closed from February 2-6, 2022. Please continue to check our website for more information regarding changes to our operations," the mall says on its [website](#).

In a statement, Cadillac Fairview says, "Out of an abundance of caution as the events in downtown Ottawa continue to progress and based on direction from Ottawa Police Services and the City of Ottawa, CF Rideau Centre will remain closed to the public for the remainder of the week. The shopping centre expects to be closed from Wednesday, February 2 to Sunday, February 6, pending any new guidance from Ottawa Police Services and the City of Ottawa."

Employees say closing the mall was the right call. Julia Adjogble is a part-time employee at Farm Boy.

"It is for my safety. If I were to work today or Friday, I would not feel safe," Adjogble said.

She says she does worry about when her next paycheck will come.

"I rely on that money for my future... it's for school. It will have an impact on my savings because I rely on that. And I genuinely like going to work, so it will be a change for me."

The pharmacy at Shoppers Drug Mart in the Rideau Centre will remain open for those looking to fill prescriptions.

In a statement to CTV News, Loblaw Public Relations, the parent company says, "While the Rideau Centre remains closed, the Shoppers Drug Mart pharmacy continues to serve its patients by filling prescriptions and providing vaccinations, as well as providing access to our pharmacists who are trusted health care providers for the local community."

The closure is also having a major impact on neighbouring areas like the Byward Market, who rely on foot traffic from the mall.

"The Rideau Centre isn't just about business for us, it is also our link to the transit system, the trains and the buses through the downtown core," Kalin McCluskey, Executive Director at the ByWard Market BIA, says.

McCluskey says BIAs that are affected by the convoy have come together and are communicating with city officials and police.

"We are hoping that this can be resolved as quickly and efficiently as possible. We want no loss to safety and security – absolutely not. But our businesses need to get to work, people rely on their wages, rely on their services- we need disruptions to come to an end."

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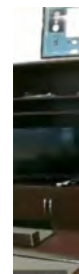
Ottawa police expect 'Freedom Convoy' protest to grow this weekend



Protest may grow by weekend



Ottawa police seek help identifying suspect



Sloly: 'I



Ted Raymond



Michael Woods

Updated Feb. 2, 2022 5:22 p.m. EST
Published Feb. 2, 2022 4:00 a.m. EST

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Ottawa police say they're anticipating the "Freedom Convoy" protest that has snarled traffic and filled downtown Ottawa with relentless noise to grow again this weekend as more demonstrators return and that policing may not bring the protest to an end.

"The intelligence that we're seeing currently is that we will continue to see the convoy attempt to hold what they have," said deputy chief Steve Bell at a technical briefing on Wednesday. "Expect to see increased vehicular traffic Saturday and through weekend, decreasing Monday."

Bell called the demonstration something "between a demonstration and a long-term plan to occupy our streets." Acting deputy chief Trish Ferguson said that most of the demonstrators who were in the city over the weekend have left and what remains is "a highly-determined and highly-dedicated group of unlawful individuals."

However, with more on the way, Ferguson said police have the resources to respond.

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'No policing solution': Sloly

Ottawa police chief Peter Sloly suggested that a solution could lie outside the police force's hands.

"There may not be a policing solution to this demonstration," he said.

Speaking to reporters, Sloly elaborated to say that the police service is looking at all options on the table.

"From negotiation, through to court injunction, through to an enforced removal, all of the options that are available to us," he said.

He compared the demonstration in Ottawa to other demonstrations around Canada, such as the blocking of the Canada-U.S. border in Alberta, saying that the protest in Ottawa is part of a larger movement.

"We are not as confident as we have been that police alone will resolve this situation substantially, nevermind in totality," he said.

"There is likely no policing solution to this, but in combination with other efforts, there may be other opportunities to substantially reduce, if not end this demonstration."

When asked whether the Prime Minister needs to step in, Sloly said that's up for him to decide.

"That's a question for politicians to decide. That's a question for the Prime Minister's Office," he said. "I have a responsibility under the police act to look after the safety of this city and that's exactly what I've been doing and will continue to do so, but there needs to be other elements brought in to finding a safe, swift, and sustainable end to this demonstration that's happening here and across the country."

Sloly again emphasized that, to date, there have been no serious injuries, no deaths, and no riots as a result of police enforcement. He stressed that there will be consequences for criminal activity, even if it isn't immediate.

"To unlawful demonstrators: there are consequences for your behaviour. There have been arrests made. There have been charges laid. There are more coming. They will be announced even today," he said. "We will find those who committed criminal acts, we will lay charges, and they will face the possibility of jail."

He made the same promises to those who have caused traffic problems and anyone who may have spread hatred and bigotry, and to those who desecrated the National War Memorial.

"To residents of Ottawa, we know you're hurting. We know you want more action," Sloly continued. "We are escalating our actions, including enforcement. We are doing so without escalating public safety risks. We do not want riots; we cannot accept deaths, but all options on the table."

Mayor Jim Watson told the technical briefing that residents are frustrated, frightened, and angry. He said he's spoken with Prime Minister Justin Trudeau to ask for resources from the RCMP. He also says he spoke with Treasury Board President Mona Fortier and Ontario Finance Minister Peter Bethlenfalvy about possible financial supports for people impacted by business closures related to the demonstration.

Military aid an option, but not without risk, chief says

Sloly said all options are on the table, including the military.

"We're looking at every single option, including military aid to civil power," Sloly said. "I've had those discussions with the mayor, council members, the board. There is a process. It's extremely well-established, extremely well-governed and extremely rare. The only two occasions I'm aware of in the last 100 years was in the Oka crisis and in the FLQ crisis."

Sloly said bringing in Canadian Armed Forces members creates a different set of risks.

"There are some amazing capabilities that come with it and there are some incredible risks that go with it as well. It is not a decision to be taken lightly," he said.

"Military are war-fighters and peacemakers. They are not peacekeepers and they are not police officers. They have a different training and equipment and mindset when it comes to assessing threats, and they have a whole different toolset and training set to effect the mitigation if not the end of that threat," Sloly added. "Mixing them into the population in the downtown core, in a highly volatile situation without any much more than days in advance warning may mitigate some risks and may create and escalate a whole bunch of other risks."

Sloly also said that preventing protesters from driving into the city is not an option. He said it would violate the right to freedom of movement under the *Charter of Rights and Freedoms* and even if it didn't, it would be nearly impossible and very damaging to effectively "seal off" the city.

Some arrests made

Ottawa police have made a third arrest in relation to the 'Freedom Convoy' protests that have shut down parts of Ottawa since Friday.

Police said Wednesday morning they have charged a 48-year-old Quebec man for making threats and comments on social media while he was in Ottawa.

Police did not release the man's name, but said he is facing charges of uttering threats and counselling to commit an indictable offence.

Sloley said Wednesday there are 18 active investigations into events linked to the demonstration.

Trucks remain on Wellington Street in downtown Ottawa, although the number of demonstrators is dwindling. Police said Tuesday night about 250 remained on and around Parliament Hill. Organizers of the protest say they plan to stay "as long as it takes for freedom to be restored."

In a news release issued Wednesday morning, organizers said they plan to remain in Ottawa until governments across Canada "end all mandates associated with COVID-19."

"The number of participants who have travelled from every region of Canada to be in Ottawa was a surprise even to us," spokesperson Tamara Lich said in the release. "It was a bit overwhelming at first from a logistical point of view, but we are now well organized and are settling in."

The protest, which began on Friday but saw the largest group of demonstrators on Saturday, has caused disruption for downtown residents and forced the continued closure of local businesses, including the Rideau Centre mall.

Last night, police said a 29-year-old Ottawa man was arrested Tuesday and charged with mischief under \$5000 in connection with an incident on Saturday and a 37-year-old Ottawa man was arrested on Sunday and charged with carrying a weapon to a public meeting. The weapon was revealed to be a long gun, which was seized.

The Ottawa Police Service has set up a dedicated hotline to report any criminal activity related to the demonstration. Hate-motivated incidents can be reported to 613-236-1222 ext. 5015. Other crimes can be reported to 613-236-1222 ext. 7300.

Police said Tuesday that eight complaints have been made to the hotline, three of which are being investigated by hate crime investigators. Police also said "some progression" has been made in the investigation into the desecration of the National War Memorial.

"We want to be very clear, both for the current demonstrations and any planned demonstrations: Illegal activity will not be tolerated," a media release said.

'We actually respect the city of Ottawa'

Area residents have complained of sleepless night because of the noise from the downtown core since the weekend. But one member of the convoy said that the demonstrators are staying within Ottawa noise bylaws.

"The horns have not been honking all night long the past few nights. They actually stick within the Ottawa bylaw. There are no horns honking between 11 p.m. and 7 a.m.," Jeff Gaudry, who came from Vernon, B.C., told CTV Morning Live on Wednesday.

"The weekend when everyone was here, there was quite a bit of a celebration going on," he added. "But the people that are here right now, we actually respect the city of Ottawa. The streets have never been cleaner."

In their [news release](#), convoy leaders said they regret that Ottawa residents are "bearing this inconvenience."

"Our message to the citizens of Ottawa is one of empathy. We understand your frustration and genuinely wish there was another way for us to get our message across," organizer Chris Barber said in the release.

A [GoFundMe](#) campaign in support of the truckers reached more than \$10 million raised on Wednesday.

Watson said the organizers' words about having empathy for the city "ring hollow" as the issues related with the protest drag on.

"People's nerves are frayed. They haven't been able to sleep for five nights in a row. People are being harassed on the street, being attacked in coffee shops," Watson said. "The organizers of this protest aren't hurting the government, they're hurting the people of Ottawa. And I think it's time they show some leadership, show some backbone, and get out in front of this and say, 'Folks, we've made our point. We're doing more harm than good by parking and honking all hours in residential neighbourhoods. It's time to move on.'"

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A man blows on a horn as he walks past trucks parked in the downtown core on Tuesday (THE CANADIAN PRESS/Adrian Wyld)

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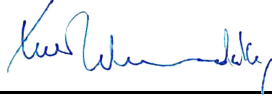
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Local News

Diesel fumes bring risk of serious health issues for Centretown residents, experts say

Tom Spears, Special to the Citizen

Feb 02, 2022 • February 2, 2022 • 3 minute read • 9 Comments



Experts say particles in diesel fumes generated by the truck convoy protesters could lead to serious health problems for some residents in Ottawa's downtown core. PHOTO BY ASHLEY FRASER /Postmedia

Some downtown Ottawa residents who are breathing non-stop diesel exhaust from the truck convoy have an increased risk of asthma attacks or even a heart attack or stroke, experts say.

STORY CONTINUES BELOW

“A daily increase in pollution, including from diesel, can result in increased risk,” said Dr. Paul Villeneuve, an epidemiologist at Carleton University who studies health effects of air pollution. “It can affect things like inflammation of the respiratory system, which can in turn put pressure on cardiovascular functions too.”



“There are actually a number of studies, including some in Canada that I’ve been involved with, that show that even day-to-day increases in air pollution will increase the risk of going to the hospital for

things like asthma, cardiovascular disease (and) stroke,” Villeneuve said.

“People who have pre-existing conditions (such as) heart disease or people with diabetes — they tend to be more at risk for some of these short-term increases in air pollution and diesel exposure.”

STORY CONTINUES BELOW

The risk in central Ottawa likely rises as the protest drags on. “You’re getting cumulative effects and stresses on the system (i.e. the body),” he said.

“You know our hospitals are really under siege right now in terms of the number of visits and the last thing we need are people showing up in the hospital because they need attention due to increases in diesel emissions. Whether it be cardiovascular, respiratory or stroke-related issues.”

Studies of urban air pollution show levels of pollutants often vary widely within neighbourhoods, he said. Weather is a key factor, he said, since we depend on the wind to clear the air. “Things like wind and wind speed become really important.”

As well, winter makes it harder for the air to scatter the pollution.

STORY CONTINUES BELOW

“We tend to find that in winter, pollution levels tend to be a little bit higher because emissions are trapped a little bit more. They can’t dissipate as well as in the summer when the temperatures are warmer. Some of the biggest air pollution episodes historically have been in the wintertime,” including the massive smoke and fog episode in 1950 London that killed thousands.

Villeneuve will send his students onto OC Transpo buses next summer to compare the quality of air inside diesel buses against newer electric buses.

The U.S. Occupational Safety and Health Administration ([OSHA](#)) [website says](#) that “workers exposed to diesel exhaust face the risk of health effects ranging from irritation of the eyes and nose, headaches and nausea, to respiratory disease and lung cancer.” Cancer is only considered a risk from long-term exposure.

STORY CONTINUES BELOW

Diesel exhaust contains tiny particles that have long been known as a health risk, said Michael Perley, a longtime campaigner for clean air in Ontario. Perley is the former director of the Ontario Campaign for Action on Tobacco and was co-leader of the Canadian Coalition on Acid Rain.

“I sure wouldn’t want to be someone with asthma” in central Ottawa now, he said. “Asthma is a serious health problem, particularly for young children.”

Anyone with any kind of lung condition will feel the effects of particles in diesel exhaust, Perley said. “The concentration would be the key factor,” he said.

“If you have trucks lined up and running all the time... or if people can smell diesel constantly, that says there’s a high concentration.”

VIEW A GALLERY OF PHOTOS FROM DAY 6 OF THE TRUCKER DEMONSTRATIONS IN DOWNTOWN OTTAWA

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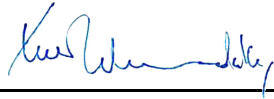
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Alberta RCMP statement regarding Coutts border assembly- Update #1

📅 February 2, 2022

News release

📍 Coutts, Alberta

The Alberta RCMP continue to respond to the Coutts border crossing.

This afternoon, in response to concerned citizens in the area of Coutts, the participants in the blockade made the decision to open a lane going northbound and southbound on Highway 4 near the Coutts border. This allows for area residents to have freedom of movement, school bussing that was impacted to be reinstated, emergency services to provide full services, border access and the flow of goods and services to resume.

The Alberta RCMP acknowledges the work that is being done.

Since the onset of the blockade, the Alberta RCMP has been actively engaging with participants of the blockade to re-open lanes of traffic.

The Alberta RCMP remain on scene and our efforts continue to be focussed on fully reopening services.

–30–

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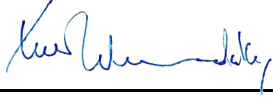
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'Significant element' from U.S. involved in self-described 'Freedom Convoy' in Canada, official says

By Amanda Coletta and Annabelle Timsit

February 2, 2022 | Updated February 2, 2022 at 8:36 p.m. EST



TORONTO — Ottawa police said Wednesday that a “significant element” from the United States has been involved in the participation, funding and organization of a self-described “Freedom Convoy” that has for several days jammed streets in the capital to protest public health measures and Prime Minister Justin Trudeau.

“They have converged in our city, and there are plans for more to come,” said Ottawa Police Chief Peter Sloly. He said that the participants, who also include locals and other Canadians, are “putting our city and our residents, our partners and our officers at great risk.”

The number of protesters has declined substantially from the thousands on Parliament Hill over the weekend. But a determined core group remains, officials say. With trucks noisily blocking streets, businesses shut down and residents frustrated for the sixth day, pressure has mounted on police to bring a resolution to the disruption.

“We are trying to be responsible, lawful, ethical and measured,” Sloly said. “The longer this goes on, the more I am convinced there may not be a police solution in this demonstration.”

Meanwhile, media reported that there had been a breakthrough in a blockade of a busy U.S.-Canada border crossing in southern Alberta, with protesters agreeing to open up one lane of traffic in each direction, citing lawyers working with the group.

Canadian officials had denounced the blockade as “unlawful.” It has blocked traffic since Saturday, creating traffic chaos and disrupting the flow of goods and services in solidarity with the demonstrators in Ottawa.

“What may have begun as a peaceful assembly quickly turned into an unlawful blockade,” the Royal Canadian Mounted Police in Alberta said in a statement Tuesday, pledging to take action to clear the blockade under local laws that prevent interference with critical infrastructure, after attempts to negotiate with the protesters broke down.

Alberta Premier Jason Kenney said Tuesday that he had been told of “people aligned with the protesters assaulting RCMP officers” and “trying to ram members ... later leading to a collision with a civilian vehicle.”

The protests in Ottawa have sparked “several criminal investigations” into “threatening” and “illegal” behavior. Monuments including the National War Memorial were defaced, and demonstrators displayed “intimidating” behavior toward police and others, including staff members at a soup kitchen for homeless people, police said.

Some protesters carried Confederate flags, and at least one flag with a swastika drawn on it could be seen. Three people have been charged with offenses related to their actions during the protest, according to Ottawa police, and more than a dozen other investigations are underway.

Trudeau, who earlier said the demonstrations represented a “small fringe minority,” condemned protesters who displayed “symbols of hatred and division” this week. The convoy has garnered the support of several federal Conservative lawmakers.

A GoFundMe campaign for the Freedom Convoy organized by Tamara Lich — a former regional coordinator of “Wexit,” a movement pushing for Alberta to separate from Canada — had raised nearly \$8 million as of Wednesday morning. The page says that it seeks funds for fuel, food and lodging and argues that vaccine mandates are “destroying the foundation of our businesses, industries and livelihoods.”

GoFundMe said Wednesday that it was pausing and reviewing the fundraiser “to ensure it complies with our terms of service and applicable laws and regulations.”

The convoy also has attracted support beyond Canada’s borders. Former president Donald Trump and Tesla founder Elon Musk, an opponent of vaccine mandates, have spoken in support of the truckers.

Canada and the United States announced last year that they would require truck drivers entering their respective countries to be fully vaccinated. Canada implemented its measure Jan. 15, while the U.S. requirement started on Jan. 22. Most cross-border trade between the two countries occurs over land.

If Canada were to drop its rule, unvaccinated Canadian truckers still would not be able to enter the United States.

The protest has snowballed into a demonstration against Trudeau, who was reelected in September with a minority government, and against coronavirus restrictions in general, which are imposed mostly by provincial governments.

Canada Unity, one of the groups behind the protests, said it wanted the governor general, Queen Elizabeth II's representative in Canada, and the Senate to rescind the mandates or to dissolve the government — which is beyond their constitutional powers.

The Canadian Trucking Alliance, an industry group, said Saturday that many of the people at the weekend's protests "do not have a connection to the trucking industry." The alliance said the vast majority of its members are fully vaccinated.

In Alberta, local lawmaker Grant Hunter, of the right-of-center United Conservative Party, sparked a controversy when he posted a photo from the Coutts border crossing over the weekend with the caption: "I brought the grandkids down to the Coutts border today to show them the importance of standing up for freedom and liberty."

In a follow-up statement Tuesday, Hunter wrote that he exercised his "constitutional right" to support the protest and its goal of ending public health restrictions.

"When I was there, the highway remained open to traffic and was not blocked off," he said. "I have stated my support to get back to normal in Alberta and move from pandemic to endemic. ... That being said, a peaceful protest is not a blockade that stops people from moving freely and so I ask those who are blocking the Coutts border crossing to let people through."

Sonya M. Savage, Alberta's energy minister, tweeted Tuesday that while she supports "Canadians' democratic rights to peaceful protest," she believes that "blockades of critical infrastructure cross the line."

"This blockade must end," she said.

Jennifer Hassan and Adela Suliman contributed to this report.

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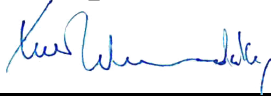
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Algonquin Nation issues

statement saying it 'does not

statement saying it ‘does not support’ ceremony, and truckers convoy actions on traditional territory

APTN National News (<https://www.aptnnews.ca/author/news/>)

Feb 02, 2022

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Chiefs say permission wasn’t granted to hold pipe ceremony or erect teepee on Algonquin lands.



A participant at a ceremony in Confederation Park on Algonquin Territory in Ottawa. Photo: TikTok

The Algonquin Nation issued a joint statement Wednesday saying it’s not in support of the “Truckers Convoy” or events that took place in Confederation Park on Wednesday.

“For greater certainty, this Joint Press Release from the Algonquins of Pikwakanagan, the Algonquin Anishinabeg Nation Tribal Council and Kitigan Zibi Anishinabeg

(<https://kitiganzibi.ca/>) is to inform other Indigenous Nations, the public, corporations, the government of Canada, Ontario and their respective municipalities that the following Chiefs listed here do not support what is happening on our traditional territory,” the statement starts.

Since Saturday, thousands of people and hundreds of vehicles have occupied downtown Ottawa – the traditional territory of the Algonquin Peoples, in part, to get the federal government to end its vaccine mandate.

While the protest, also attended by an unknown number of Indigenous people, was sparked by the mandate – the protest has been marred by people carrying swastika and confederate flags, calling for the overthrow of the government and jamming the downtown and blowing horns at all hours of the day and night in the city’s core where thousands of people live.

On Wednesday, a ceremony took place in Confederation Park, a short walk from the national cenotaph where one person was filmed dancing on the tomb of the unknown soldier on the weekend. It’s not clear who the participants were in the ceremony – but the Algonquin chiefs didn’t like what they were watching.

“The actions that are taking place on our Territory (Ottawa, ON) is unacceptable,” the statement says. “For those who are participating in these actions, the Algonquin Nation does not support the set up of a teepee, the pipe ceremony and sacred fire in Confederation Park in support of the “Freedom Convoy.”

“The Algonquin Nation did not give consent to these ceremonial practices and could cause more harm to who we are as First Nations/Algonquin peoples. First Nations and Non-Indigenous people should always remember protocol and that permission from us is needed to

protocol and that permission from us is needed to proceed.”

Chief Dylan Whiteduck
@DylanWhiteduck



Joint Press Release Re: the
Confederation Park and Truckers
Convoy

According to police, who have been largely standing by and monitoring the protest, the number of people in the city is decreasing – but still a few hundred remain.

“This letter is to serve notice that the Algonquin Nation does not support or endorse these actions at Confederations Park.”

The letter is signed by Chief Wendy Jocko, Algonquins of Pikwakanagan, acting Grand Chief Savannah McGregor, Algonquin Anishinabeg Nation Tribal Council and Chief Dylan Whiteduck, Kitigan Zibi Anishinabeg.

Read More:

Soft police approach to Ottawa anti-vax protest reveals ‘pure racism’ say critics
(<https://www.aptnnews.ca/national-news/soft-police-approach-to-ottawa-anti-vax-protest-reveals-pure-racism-say-critics/>)

The police are defending their strategy in dealing with the protest saying officers are dealing with various groups

within this one protest including “lone wolves” who are

not communicating what their actions are going to be
police chief Peter Sloly.

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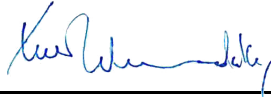
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Feedback

Demonstration-Related Traffic Enforcement in Downtown Neighbourhoods

Posted On Thursday February 03, 2022

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FOR IMMEDIATE RELEASE: Thursday, February 3, 2022 9:07am

Demonstration-Related Traffic Enforcement in Downtown Neighbourhoods

(Ottawa) – The Ottawa Police Service Traffic Enforcement Unit is actively patrolling downtown residential neighbourhoods to address traffic issues related to the ongoing demonstration.

On Wednesday, police charged one man criminally, laid 30 traffic tickets and patrolled areas including Centretown, Sandy Hill, Glebe and the Market/Lowertown areas. This enforcement will continue daily.

Police laid eight charges for unnecessary noise (honking of horns), one for transporting dangerous goods (insecure fuel cans), one for improper muffler, four for disobeying signs, two for driving the wrong way in one way traffic, one unsafe lane change, one distracted driving, six speeding, one running a stop sign and five document offences.

One driver was charged for driving while criminally prohibited. The vehicle was impounded for 45 days.

Police have also deployed cruisers with Automatic License Plate Readers (ALPR) technology. ALPR is a device which helps police ensure road safety by identifying a variety of Highway Traffic Act (HTA) infractions, including stolen licence plates and suspended or unlicensed drivers.

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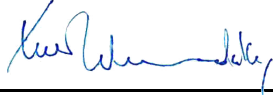
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Tungasuvvingat Inuit says truckers protest in Ottawa causing 'anxiety and increased fear'

APTN National News (<https://www.aptnnews.ca/author/news/>)

Feb 03, 2022

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The Inuit organization is asking protesters to go home.



A line of trucks block in downtown Ottawa block access to Parliament Hill. Photo: Mark Blackburn/APTN.

An Inuit organization in Ottawa that provides a number of services to Inuit in the city says the truckers protest “has introduced a high-level anxiety and increased fear” for its clients and Indigenous communities in the national capital area.

“Today, we add our support to the Algonquins of Pikwakanagan, Kitigan Zibi and the Algonquin Nation Tribal Council in opposition to the “Freedom Convoy Protest” using cultural practices of Indigenous people in ceremonies,” says a statement released by Tungasuvvingat Inuit (<https://tiontario.ca/>), better known in the area as TI.

“TI believes in the right to peaceful protests however, the protest in downtown Ottawa have introduced a high-level anxiety and increased fear for the vulnerable Indigenous communities in the area. By virtue of the ongoing blockades and volume of protestors and trucks, this demonstration has impeded TI’s ability to provide critical programming and services to urban Inuit.

“In a period with recent extreme cold warnings, the ongoing health crisis, the emergency housing crisis and food security issues, the protest is negatively impacting those vulnerable members of our community.”

Since the weekend, hundreds of trucks and protesters have clogged Ottawa’s downtown core in front of Parliament Hill – but also in neighbourhood communities. Some residents say the trucks idle throughout the night and horn blasts can be heard at all hours.

Much of the core centre of downtown has been closed off by police because of the trucks blocking major thoroughfares through the area

Ottawa sits on the traditional territory of the Algonquin peoples. On Wednesday, a joint statement was released by the Algonquin Nation (<https://www.aptnnews.ca/national-news/algonquin-nation-truckers-convoy-traditional-territory-ottawa/>) condemning the truckers convoy and a ceremony that was held in a downtown park.

“The actions that are taking place on our Territory (Ottawa, ON) is unacceptable,” the statement says. “For those who are participating in these actions, the Algonquin Nation does not support the set up of a teepee, the pipe ceremony and sacred fire in Confederation Park in support of the “Freedom Convoy.

“The Algonquin Nation did not give consent to these ceremonial practices and could cause more harm to who we are as First Nations/Algonquin peoples. First Nations and Non-Indigenous people should always remember protocol and that permission from us is needed to proceed.”

One of the participants in the ceremony was protest organizer Pat King who apologized in a youtube video on Feb. 2.

He’s one of the many organizers who say the people here “are exercising our right to a peaceful protest and we are peaceful.”

Tungasuvvingat Inuit
@TIOntario



Press Release - February 3, 2022, OTTAWA, ON.

**TUNGASUVVINGAT INUIT STATEMENT - TRUCKER
PROTEST EFFECT ON VULNERABLE COMMUNITY IN
DOWNTOWN OTTAWA**

Read more:

But not everyone is describing the protest as peaceful. While there have been few arrests, local residents have complained about idling trucks, fumes, and the constant blowing of horns.

“The protest was positioned as a peaceful but, has turned into large intimidating crowds threatening the safety of vulnerable individuals that require supports from service and program providers in downtown Ottawa,” TI says in the statement

“There is an increased level of concern shared amongst service

providers and clients following incidents that included harassment of shelter services workers, demand for food intended for food-insecure individuals, the inability to reach vulnerable community members requiring urgent supports, blocking access for services providers to help the vulnerable, impacting the sheltering system for women and homeless and the intimidating presence and ongoing noise.”

There are now rumours that the second wave of protest is scheduled for downtown Ottawa this coming weekend.

Read more:

Soft police approach to Ottawa anti-vax protest reveals ‘pure racism’ say critics
(<https://www.aptnnews.ca/national-news/soft-police-approach-to-ottawa-anti-vax-protest-reveals-pure-racism-say-critics/>)

At a briefing with Ottawa city councillors on Wednesday, Police Chief Peter Sloly seemed to throw up his hands and suggest that law enforcement may, in the end, have a limited role in resolving this protest.

Sloly said “all options are on the table,” including calling in the military. The word “occupation” is now being used to describe what is happening downtown.

Sloly said ending the protest, which rolled into the city as a convoy last Friday, could come through negotiations or it could come through police enforcement.

“All such options come with significant risks,” Sloly said at the meeting.

Here is a scene from the protest on Wellington St. outside the Prime Minister’s Office:

00:41



Police estimated the protest involved 8,000 to 15,000 people on Saturday but has since dwindled to several hundred.

For residents, businesses and organizations like TI, there is one request.

“We respectfully ask that the protestors remove themselves from Ottawa. It is time to go home and allow for our vulnerable urban Indigenous communities to feel safe again and regain access to cultural programming and essential services,” Tungasuvvingat Inuit says.

At a short news conference, the leaders of the truckers protest said that the protest has in fact been peaceful, and cleaning up the downtown core and serving food to people on the streets. The leaders only answered two questions before abruptly leaving the meeting room.

With files from the Canadian Press

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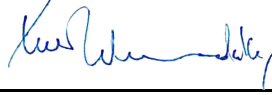
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Politics

GoFundMe and the Ottawa convoy protest — your questions answered

GoFundMe executives have been called to testify in Parliament about the company's operations

[Nick Boisvert](#) · CBC News · Posted: Feb 04, 2022 4:00 AM ET | Last Updated: February 4



A man blows on a horn as he walks past trucks parked in Ottawa's downtown core on Feb. 1, 2022. (Adrian Wyld/The Canadian Press)

UPDATE: The crowdfunding platform GoFundMe said Friday it [will stop payments to the organizers of Freedom Convoy 2022](#) because the protest violates its rules on violence and harassment.

As a truck convoy protesting vaccine mandates enters its second week of demonstrations in Ottawa, questions are being asked about GoFundMe and its role in the protest.

Protest organizers have raised more than \$10 million through the U.S.-based crowdfunding platform. The money is supposed to cover fuel and other expenses for truckers protesting Canada's pandemic measures.

But the company has called a halt to disbursement of the money raised, citing concerns that the money may not be used in ways that comply with [GoFundMe's terms of service](#).

- [Thousands in lost revenue, wages as protest hits one-week mark](#)

Here are answers to some questions our readers are asking about GoFundMe and the protest:

Q: Where is the money coming from?

The protest organizers have raised nearly \$10.1 million from more than 120,000 donors. The identities and locations of many of those donors remain a mystery.

A CBC analysis found that about one-third of donors were anonymous or used aliases. The fund also has received money from donors in other countries, including the United States, the United Kingdom, Australia and Poland.

- [GoFundMe pauses anti-vaccine mandate protest fundraiser](#)

Ottawa Police Chief Peter Sloly also spoke this week of a "significant element from the U.S. that have been involved in the funding, the organizing and the demonstrating."

[Citing data protection regulations](#), GoFundMe says it does not make complete information about donors available — even to fundraiser organizers.

Q: Who are the fundraisers?

An organization called Canada Unity has taken responsibility for organizing the convoy. Tamara Lich and B.J. Dichter are listed by GoFundMe as the organizers of the fundraiser.

Lich spoke to the media on Thursday and said the convoy will not leave Ottawa until its demand for an end to all pandemic restrictions is met.

Canada Unity, meanwhile, has published a "memorandum of understanding" calling on Canadian senators and the Governor General to abolish all restrictions related to COVID-19 and reinstate any unvaccinated workers fired due to vaccine mandates.

The document says the Senate and Governor General must "RESIGN their lawful positions of authority immediately" if they do not agree to the group's terms.

Elements of this story came from audience members, like you, who got in touch with us. Send us all of your questions. We are listening: ask@cbc.ca.

But the demands included in that memorandum are not mentioned on the GoFundMe page.

Keith Wilson, a lawyer representing the protest, said on Thursday that the "bulk" of the money has not yet been paid out to the organizers.

Q: Are there rules preventing fundraising for illegal activities?

Yes — but it's not clear that the actions of the convoy protesters have violated the company's rules.

The company prohibits fundraising for activities that support "hate, violence, harassment, bullying, discrimination, terrorism, or intolerance of any kind."

The presence of Confederate flags and swastikas at the protest has been widely condemned, but the organizers' GoFundMe page does not make explicit reference to the promotion of hate or intolerance.

Ottawa Mayor Jim Watson has called the protest illegal but it's not clear that the convoy violates GoFundMe's terms of service. (Francis Ferland/CBC)

GoFundMe does not prohibit fundraising in support of peaceful protest, and the right to protest is protected under Canada's Charter of Rights and Freedoms.

But the convoy has blocked access to several downtown blocks and is making downtown Ottawa residents miserable by constantly sounding truck horns at all hours. Residents have reported being yelled at and intimidated by protesters. Businesses have shut their doors, citing safety concerns.

Ottawa Mayor Jim Watson has described the protest as an "illegal action."

Q: Does GoFundMe make money on donations?

GoFundMe is a for-profit company but it no longer takes a cut of donations made through its website.

The company used to take a five per cent cut of donations. It dropped that fee in 2017 and now only asks donors for tips. It's not clear how much the company has received via tips from donors to the convoy.

- [Large number of donations to support convoy came from aliases, unnamed donors](#)
- [Trudeau rules out negotiating with protesters, says military deployment 'not in the cards'](#)

GoFundMe still charges a 2.9 per cent fee (plus \$0.30 per donation), which the company says is used to cover the cost of credit and debit transactions.

Q: Could money in the fund be seized to cover expenses for the City of Ottawa?

Almost certainly not, according to the company's terms. If the money is withheld from organizers, it most likely will be reimbursed to the donors.

GoFundMe's terms say the company "may, at any time, for any reason, without notice, and in its sole discretion, offer or issue a refund of Donation(s) with or without consulting with [the fundraiser]."

Watson has asked GoFundMe to hold the remaining funds until the protesters leave Ottawa.

"Get out of town and then you can have access to your funds," he said.

Q: Is GoFundMe regulated in Canada?

Not explicitly — but MPs now seem interested in learning more about the company's operations.

On Thursday, a parliamentary committee asked GoFundMe executives to testify about how the company avoids funding extremism and hate through its services.

- [Ottawans bracing as protest numbers expected to swell this weekend](#)

"There are some real questions about transparency given the fact that the fund is now exceeding \$10 million, many of the donors are anonymous and many of the donors are in places outside of Canada's jurisdiction," NDP MP Alistair MacGregor told CBC News.

The federal government says it has not had any communication with GoFundMe during the protests.

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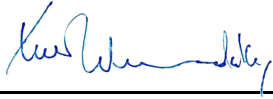
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Feedback

Ottawa Police Service Implements Increased Measures to Protect Downtown Neighbourhoods

Posted On Friday February 04, 2022

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FOR IMMEDIATE RELEASE: Friday, February 4, 2022 9:00AM

(Ottawa) – The Ottawa Police Service and its partners are implementing a surge and contain strategy in Ottawa's downtown neighbourhoods to further protect neighbourhoods, restore order and prevent unlawful activity.

In connection with ongoing demonstrations, Ottawa's downtown residents and businesses continue to be severely impacted by unlawful acts, including harassment, mischief, hate crimes, and noise violations. We know that additional demonstrators are coming, and we are significantly increasing our policing resources to respond.

To prevent and reduce the impacts of demonstrators entering the downtown core, and to improve neighbourhood safety, the Ottawa Police Service is implementing the following measures – effective immediately

Major deployment of police officers in the downtown neighbourhoods: There will be approximately 150 additional uniformed and non-uniformed officers dedicated to only patrolling and addressing unlawful and threatening conduct in the most impacted neighbourhoods including: Centretown, Sandy Hill, Lowertown and the ByWard Market. This includes working with City and NCR officials to prevent unlawful and unsafe use of public space by demonstrators.

Expand and harden perimeter of the demonstration red zone: The Ottawa Police Service and City of Ottawa will be utilizing concrete and heavy equipment barricades to create no-access roadways throughout the downtown core. The City of Ottawa will be releasing a map of impacted roads later today. Protestor vehicles will be directed to designated parking zones outside of the downtown core. Illegal

parking by demonstrators will result in by-law enforcement, removal and impound. If necessary, interprovincial bridges, highway off ramps and/or roads will be closed.

Enforcement directives: The surge of police officers will result in enforcement to restore public safety. This includes increased investigation enforcement and charges for all criminal acts related hate, harassment, assaults (including spitting), intimidation, and mischief.

Enhanced intelligence operations and investigations: National, provincial and local intelligence agencies have increased efforts to identify and target protestors who are funding/supporting/enabling unlawful and harmful activity by protestors. Investigative evidence-gathering teams are collecting financial, digital, vehicle registration, driver identification, insurance status, and other related evidence that will be used in criminal prosecutions. Every unlawful act, including traffic violations, will be fully pursued regardless of origin.

The primary focus of each of these measures will be on the unlawful behaviour connected to the ongoing demonstrations (including parallel and counter demonstrations).

We strongly urge all demonstrators and those engaging with demonstrators to act lawfully, peacefully and respectfully.

The hatred, violence, and illegal acts that Ottawa residents and businesses have endured over the last week is unacceptable in any circumstance. The Ottawa Police Service and the City of Ottawa are bringing significantly greater resources to restore order, hold offenders to account and protect our neighbourhoods.

The current occupation of the Parliamentary Precinct remains unresolved despite significant success in reducing the number of trucks/demonstrators while preventing riots, injuries and death. We take no solace in these operational successes. The demonstrators in this red zone area remain highly organized, well-funded, and extremely committed to resisting efforts to end the demonstration safely. This remains a very volatile and very dangerous demonstration.

The Ottawa Police Service continues to work with the national security agencies, the RCMP, the OPP and other police agencies. We are also working with all three levels of government, to affect a safe, timely and lawful end to this unlawful and unacceptably dangerous demonstration.

Public safety remains paramount as does our commitment to work with all levels of government and all parts of civil society to bring this demonstration to an end.

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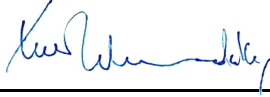
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Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

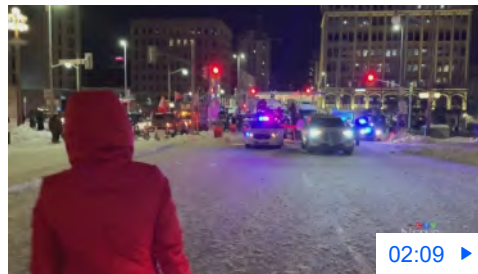
Nur Muhammed-Ally, Counsel

OTTAWA | News

Tow truck companies rejecting Ottawa police request for help: source



Surge of people, trucks arrive in the capital



Protestors show no sign of leaving



Protes



Graham Richardson
CTV News Ottawa Anchor, News at Six
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Michael Woods
CTV News Ottawa Digital Multi-Skilled Journalist
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Published Feb. 4, 2022 3:27 p.m. EST

Share



Local towing companies are rejecting Ottawa police requests for help towing 'Freedom Convoy' trucks out of the downtown core, according to a senior police source.

The source told CTV News Ottawa that even if police decided to tow the trucks from the downtown streets they have been clogging up for the past week, they wouldn't have enough tow trucks to do it.

Police outreach to tow truck companies across the city has been rebuffed, the source said.

The source said police are considering launching a criminal investigation into whether intimidation of the tow truck companies is leading to their lack of cooperation with police.

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- Road closures and service impacts in downtown Ottawa due to the 'Freedom Convoy' protest
-

Police would only have access to city-owned tow trucks used for OC Transpo buses, of which there are a limited number.

Asked about the concern on Friday, Mayor Jim Watson said that information had not been brought to him, but the city has its own fleet of tow trucks.

“All contingency plans are being worked on,” he told CTV News on Friday. “The city has a number of heavy industrial tow trucks as well, so there’s that availability, plus other companies that the city deals with on a pretty regular basis.”

Ottawa Police Deputy Chief Steve Bell said Friday there are between 200 and 250 trucks parked in the downtown core.

Police expect another 300 to 400 truck drivers to try making their way downtown this weekend, but they are setting up roadblocks and planning to direct the truckers to parking spots outside the core.

Until now, the police strategy with the remaining truckers was primarily one of negotiation. That succeeded in reducing their numbers throughout the week.

Friday morning, police said they are adopting a “[surge and contain strategy](#),” which includes sending 150 more officers to affected neighbourhoods and barricading the protest “red zone” to cut off people who want to drive downtown.

RELATED IMAGES



A cyclist stops in front of trucks blocked on Metcalfe Street as a rally against COVID-19 measures continues as a cross-country convoy protesting a federal vaccine mandate for truckers, continues in February 4, 2022. (Patrick Doyle/THE CANADIAN PRESS)

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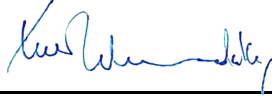


MOST WATCHED

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Truck convoy: 'Our city is under siege'

Blair Crawford
Feb 05, 2022 • February 5, 2022 • 17 minute read

<https://ottawacitizen.com/news/local-news/truck-convoy-residents-police-brace-as-protest-numbers-expected-to-swell>

1/23



OTTAWA – Anti vaccine mandate protests continuing in downtown Ottawa on Saturday, Feb. 5, 2022. PHOTO BY ERROL MCGIHON /Postmedia

The 'Freedom Convoy' that converged in Ottawa a week ago started in response to the federal government's move to require that all Canadian truck drivers crossing the U.S. border be fully vaccinated. The Canadian Trucking Alliance, the main advocacy body for truckers, has disavowed the protest, saying the vast majority of its members are fully vaccinated and are continuing to work. The core organizers of the protest insist that they are not anti-vaccine but instead oppose mandates that require vaccination for people to work.

STORY CONTINUES BELOW

What you need to know, at a glance



- Coun. Catherine McKenney says police 'surge' in downtown core 'has made no difference'
- Police extend road closures
- Ontario Trucking Association disavows protest
- Police expect 300-400 more trucks and between 1,000 and 2,000 more protesters to arrive in Ottawa Saturday
- Farmer convoys arriving in Ottawa Saturday, according to MPP who supports convoy
- Protests spread to Toronto, Winnipeg and other provincial capitals
- A class-action lawsuit on behalf of Centretown residents seeks \$9.8M for for emotional, mental and other distress and punitive damages.
- GoFundMe says no further funds will be directly distributed to the Freedom Convoy organizers
- The Ottawa Police Service says it's launching a "surge and contain strategy" with partners to tackle the protests
- City warns of continued traffic and service impacts Saturday, with numerous bus detours and several bridge closures still in effect

STORY CONTINUES BELOW

Photos: Trucker anti-vaccine mandate protest in downtown Ottawa, Feb. 5, 2022

 [View All 58 Photos](#)

1 of 58

STORY CONTINUES BELOW

9 p.m.

Physicians, nurses and health-care workers across the country released an open letter earlier in the day to Canadians, saying they “will NOT hide out of fear of violence from hate-fueled convoys.”

“We will not cower. We will not hide,” the letter stated. “We will wear our scrubs in public, without fear, knowing that you — Canadians — have our backs.”

Jerry Fiori, chair of the Ottawa Disability Coalition, also released a letter addressed to Premier Doug Ford, Mayor Jim Watson and Coun. Diane Deans, urging them to put a swift end to the downtown protests.

“The Ottawa Disability Coalition demands that you immediately take all actions necessary to restore the rights and freedoms of the residents of this occupied area and those who provide comfort and services to them. The protest must be put to an end and the area cleaned,” it read.

STORY CONTINUES BELOW

“While the Ottawa Disability Coalition (ODC) recognizes the rights of people to freedom of speech, freedom to assemble and freedom of choice, it also recognizes the rights of everyone to the freedom of movement and to life, liberty, and security of person.”

6:32 p.m.

The Ottawa police issued a news release stating that the service was working with U.S. authorities to investigate email-based threats to “public officials”.

More than 150 calls had been made to the hate-related hotline, it said.

Also, police said they continued to use a “surge and contain strategy” focusing on preventing and reducing the impact of the truck protesters. “We continue to advise demonstrators not to enter Ottawa, and to go home,” it

said.

STORY CONTINUES BELOW

The police estimated that 500 heavy vehicles that are part of the demonstration are currently in the “red zone”. It said that, throughout the day, Highway 417 exits in the downtown area were sporadically being closed, including:

- Nicholas / Mann (Westbound & Eastbound)
- Metcalfe (Westbound & Eastbound)
- Bronson (Westbound)
- Parkdale (Westbound & Eastbound)
- Island Park (Westbound)
- Kent (Eastbound)
- Vanier (Eastbound)
- St. Laurent (Eastbound)
- Pinecrest Road (Eastbound)
- Montreal Road (Eastbound & Westbound)
- Woodroffe Avenue (Eastbound & Westbound)
- Aviation Parkway (Westbound)
- Walkley Road (Westbound)

Police teams continued to gather financial, digital, vehicle registration, driver identification, insurance status and other related evidence to be used in criminal prosecutions, it said.

STORY CONTINUES BELOW

All available officers remained on active duty, police said, with the focus on addressing unlawful and threatening conduct in Centretown, Sandy Hill, Lowertown and the ByWard Market.

Police said an additional 257 RCMP officers were being sworn in with special constable status.

Residents who had witnessed or been the victim of unlawful behaviour were urged to contact police at (613) 236-1222, extension 7300, or extension 5015 for hate-related crimes. Reports can also be submitted online at www.ottawapolice.ca.

5:30 p.m.

'Our city is under siege... This is madness.'

Police Services Board chair Diane Deans called the "Freedom Convoy" a threat to democracy and said the city was under siege at a special meeting of the board Saturday afternoon.

STORY CONTINUES BELOW

"Our city is under siege," Deans said. "This group is emboldened by the lack of enforcement by every level of government.

"They are terrorizing our residents, terrorizing them with incessant honking, threatening them and preventing them from leading their lives. People cannot go to work or open their businesses. They cannot sleep, walk, shop, go to medical appointments or enjoy their neighbourhood," Deans said.

"This group is a threat to our democracy. What we're seeing is bigger than just a City of Ottawa problem. This is a nationwide insurrection. This is madness."

Police Chief Peter Sloly said every available police officer is on duty and some of his officers have worked 12-hour days for two weeks straight.

STORY CONTINUES BELOW

Police estimate Saturday's crowd at about 5,000 people and included about 1,000 vehicles, both personal vehicles and tractor trailers.

Police have received 400 calls for service related to the protest on Saturday, Sloly said, and have begun 50 criminal investigations, including 11 allegations of hate crime. Four people have been charged, Sloly said.

Police continually described the protest, now in its second weekend, as unprecedented and like nothing they'd ever experienced in their policing careers.

Active Deputy Chief Trish Ferguson described watching officers pull over and ticket a driver for blaring his horn.

"If we were dealing with reasonable people this is a deterrent," Ferguson said. "But these are not the type of people we're dealing with."

STORY CONTINUES BELOW

Meanwhile, lawyer Paul Champ who represented a downtown resident in a class action lawsuit against the truckers, said his client would be willing to drop the lawsuit if the protesters leave.

"What you're doing to the people in downtown Ottawa is just too much," Champ said in a video posted on Twitter. He said the plaintiff is offering to release anyone named in the lawsuit who leaves Ottawa by 10 a.m. Monday. Earlier Saturday, a judge adjourned a hearing on the \$9.8 million class action suit until Monday afternoon.

Paul Champ

@PaulChampLaw



Dear Freedom Convoy Truckers, my client Ms Li is making an offer to settle the proposed class action against those who have been blaring their air horns in downtown Ottawa.

Depart in peace. and we shall be released. See video...

...more details to come with the release.

Watch on Twitter

STORY CONTINUES BELOW

5:20 p.m.

A GoFundMe campaign, the Ottawa Restaurant Fund, was started Friday for Ottawa restaurants, specifically for those businesses most affected by the ongoing demonstrations. “We’re envisioning distributing grants based on demonstrated need and geographic proximity to the Red Zone,” it read. As of 5:25 p.m. Saturday, \$3,100 of a stated goal of \$250,000 had been raised.

5 p.m.

The Ottawa police tweet that they have responded to more than 400 calls for service related to the demonstrations since they began. More than 50 criminal offences are being investigated — 11 of them hate crimes that resulted in charges against four people — police said. A subsequent news release stated that seven people had been arrested and 70 traffic violation tickets had been issued.

STORY CONTINUES BELOW

4 p.m.

Police Services Board to hold special meeting as protest continues

The Ottawa Police Services Board was to hold an emergency meeting Saturday afternoon as the nine-day-old protest in downtown Ottawa grew larger and more volatile.<

The meeting will be streamed on Zoom at 4:30 p.m. and is “related to the ongoing demonstrations in Ottawa.” <

You can watch the meeting here <https://us02web.zoom.us/j/86540543600>

The situation grew increasingly tense throughout the day as a counter protest gathered near Ottawa city hall, separated from the main protest red zone by Ottawa police.

Further up Elgin Street toward Parliament Hill, Lanark’s Randy Hillier, a former Conservative MPP who was kicked out of caucus and now sits as an independent, whipped up the crowd with fiery rhetoric: “I’m telling everyone and I’m telling that coward in his cottage,” Hillier said, referring to Prime Minister Justin Trudeau and motioning to Parliament behind him. “This is the hill we die on.”

STORY CONTINUES BELOW

Earlier in the day, Hillier referred to Ottawa Mayor Jim Watson as “sleaze ball” and condemned Ottawa police for “condoning theft & stealing” after both tweeted their support for GoFundMe cancelling the fundraiser supporting the protest.

Watson, meanwhile, said he will ask Ottawa Police Chief Peter Sloly about the legality of turning operational control of the downtown protest over to federal officials.

“I’ll keep an open mind,” Watson said Saturday.

Knoxdale-Merivale Coun. Keith Egli noted Saturday that Sloly has previously stated there is no legal mechanism to turn over management of the downtown protest to the RCMP.

“The city needs all the help it can get, whether it’s from the province or the federal government,” Egli added. “And I am certainly behind anything that would urge the other levels of government to open up their toolboxes and see what they’ve got in there that can help us.”

STORY CONTINUES BELOW

3 p.m.

Class action suit adjourned; truckers said to have agreed to limit horns to 8 a.m.-8 p.m.

A class action lawsuit that could have silenced air horns and is seeking \$9.8 million in damages from organizers and some of the truckers in the so-called “Freedom Convoy” in downtown Ottawa has been adjourned until Monday.

Ottawa lawyers Paul Champ and Emilie Taman filed the statement of claim Friday, arguing that for the 6,000 residents in the immediate vicinity of the protest “the non-stop blaring horns have caused unbearable torment in the sanctity of their own homes.” The lawyers also asked for an injunction to stop the horn use.

But a lawyer defending three of the for organizers named in the lawsuit asked for the adjournment and said the truckers had been negotiating to limit their horn use to between 8 a.m. and 8 p.m.

STORY CONTINUES BELOW

Alberta lawyer Keith Wilson of the Calgary-based Justice Centre for Constitutional Freedom, called case one of “national importance.”

“The truckers have an accord amongst themselves that the horns will not sound between 8 p.m. and 8 a.m.” Wilson said at the virtual hearing before Ontario Superior Court Justice Hugh McLean.

Champ argued the noise that would still go on for 12 hours a day could still cause “irreparable hearing damage” and asked for a temporary injunction. McLean refused, in part because he said he didn’t know how he could “craft an enforceable order.” Usually, the right for someone to enjoy their homes without interference is covered by criminal law, not civil law, the judge said.

The case will be back in court Monday afternoon.

STORY CONTINUES BELOW

University of Ottawa law professor Amir Attaran was watching the online injunction application when he saw that the n-word had been posted to the chat room during the hearing. He's calling for court officials to investigate who posted the message, and to sanction anyone involved.

"This is clearly inappropriate conduct in a courtroom," Attaran said Saturday, arguing that the judge should have stopped proceedings to investigate the matter when he was informed a racial slur had been posted online. The judge instead disabled the ability of viewers to post comments.

No one on camera during the hearing was a visible minority.

Attaran said the individual who posted the comment should be found and charged with contempt of court.

STORY CONTINUES BELOW

2 p.m.

Counter protesters mass at city hall

The situation was tense in front of city hall as a few hundred "counter protesters" began arriving shortly after 2 p.m., despite advisories from police and other groups not to stage the protest due to safety concerns.

The counter protesters began gathering shortly after 2 p.m. on the City Hall Lawn across Laurier Avenue West from an encampment of protesters in Confederation mark.

The two groups were separated by a large group of Ottawa police.

The group loudly chanted slogans and called on the convoy protesters to go home.

Trucker counter protest at Ottawa City Hall PHOTO BY ELIZABETH PAYNE /Postmedia

1 p.m.

Protest grows; 'Trump 2024' flag spotted

Police presence was heavy downtown but officer again chose to step back and observe as the anti-vaccination mandate protest grew larger Saturday despite frigid temperatures that hovered around –16 C. Bundled up in parkas and snowmobile suits, protesters danced to music on Wellington Street and marched with Canadian and American flags, banners proclaiming freedom from vaccine mandates, and anti-Trudeau flags and banners.

STORY CONTINUES BELOW

A pair of protesters on horseback, one of them waving a “Trump 2024” flag, trotted around downtown. Others ferried jerry cans of fuel and cases of beer into the heart of the protest on Wellington Street. Police had promised a “surge” and increased enforcement but once again, police seemed content to keep a hands-off approach. One Durham officer shared a high-five with a child who was wrapped in a Canadian flag and wearing ear protection against the incessant blaring of airhorns.

The Ottawa Humane Society cautioned that protest site conditions such as “prolonged exposure to freezing temperatures, loud noises, road salt on paws or hooves, and inadequate access to food and water” can threaten an animal’s wellbeing.

Ottawa Humane Society 

@ottawahumane



(1/2) Reports are coming from downtown about dogs and horses that have been brought into the protest. For any animal, prolonged exposure to freezing temperatures, loud noises, road salt on paws or hooves, and inadequate access to food and water can threaten an animal’s wellbeing.

1:02 PM · Feb 5, 2022



[Read the full conversation on Twitter](#)

STORY CONTINUES BELOW

At one point, there were twitter warnings of “extremist occupiers ... looking for a fight” at Bank and Somerset streets. No major clash was reported, but MPP Jael Harden, one of several local politicians who have been conducting safety walks through neighbourhoods, said the walks have been paused while organizers assess their options.

Joel Harden 

@JoelHardenONDP



Friends in #ottawa today's safe walks are cancelled. Don't come. We will keep organizing - stay tuned for update #ottnews

ArielTroster (she/her) @ArielTroster

URGENT: word on the street is to AVOID Bank and Somerset right now.

Extremist occupiers are looking for a fight. Stay safe, avoid, avoid, avoid. Please RT.

#SomersetWard #ottcity #Ottawa #FluTrucksClan @cmckennay

STORY CONTINUES BELOW

On Friday night, when the demonstration turned the area in front of Parliament Hill into a party zone, with DJs, fireworks, campfires and dancing added to the constant blare of truck horns.

Amidst the mayhem, and disturbingly close to the fireworks, jerry cans of fuel were stashed in snowbanks and lined up next to trucks, even as more jerry cans were carried to the front line of trucks by hand and in wheelbarrows. As supporters headed to the Hill draped in Canadian flags and sounding the rallying cry of “Freedom!”, police officers were nowhere to be seen in the centre of the festivities. However, cruisers were stationed at both ends of the central Wellington Street zone – blocking off Elgin to the east and establishing a western boundary at Lyon Street with the help of recently installed concrete barricades.

STORY CONTINUES BELOW

Truckers and supporters had set up their own infrastructure, too, with tents erected on the Terry Fox plaza, a stage for the main DJ in front of Parliament Hill, and several small fires being tended along the Wellington strip, attracting clusters of folks seeking warmth in the sub-zero temperatures.

The festivities were expected to continue on Saturday night, with another DJ lined up to perform and more fireworks planned.

Noon

'Harassment and illegal activities continue with impunity', McKenney says

On Saturday, Somerset Ward Coun. Catherine McKenney said the police surge announced Friday has resulted in 20-25 additional officers in Centretown.

"By all accounts, this has made no difference," McKenney said. "The harassment and illegal activities continue with impunity."

STORY CONTINUES BELOW

McKenney vowed to bring a motion to a special council meeting Monday, asking the city to formally request the federal government take full operational control over the protest inside the Parliamentary precinct so that Ottawa police can turn their attention to residential neighbourhoods. Until then, McKenney said, "nothing will change."

"This will allow Ottawa police to focus on protecting our neighbourhoods, residents and businesses from the violent and intimidating acts of harassment, destruction and noise that we are currently experiencing every day."

Meanwhile, Ottawa police have listed a series of road and highway ramp closings, apparently to limit access to streets towards the convoy protest.

Ottawa Police  @OttawaPolice · Feb 5, 2022



Replying to @OttawaPolice

The following EASTBOUND ramps will experience sporadic closures today:

Parkdale
Rochester
Kent
Metcalf
Nicholas
Vanier
St Laurent

Ottawa Police 

STORY CONTINUES BELOW

In a statement Saturday, the president of the Ontario Trucking Association said he strongly disapproved of the protests, now spreading beyond Ottawa to other cities, and said most of the protesters have no connection to the trucking industry.

“To those in the trucking industry that have chosen to participate in this protest, your behaviour today will not only reflect upon you and your family but the 300,000-plus fellow Canadians that, like you, take great pride in our industry,” OTA president Stephen Laskowski said. “Please remember this important responsibility you bear today in delivering your message responsibly as well as the impact your actions will have on the image of many of your colleagues who do not share your opinion but share your passion for the industry and country.”

STORY CONTINUES BELOW

9:30 a.m.

Farm tractors expected to join on protest's second weekend

Ottawa braced for a second weekend of disruption Saturday as an estimated 1,000 to 2,000 more people and 300 to 400 trucks were expected to join the noisy, chaotic downtown protest now into its ninth day.

The truckers are expected to be joined Saturday by farmers en route to the city. In an email to supporters, Patricia Enright of the group, No More Lockdowns, said farm tractor convoys from will be converging on Ottawa from three directions early Saturday afternoon.

One convoy will be leaving from Alexandria at 6 a.m., another from Antrim at 9:30 a.m. and another in Franktown at 8:15 a.m.

“As we enter the second weekend of these historic demonstrations, more convoys are mobilizing across the country in solidarity with the freedom movement,” said Enright, who urged supporters to “get in your tractors, join our convoy to Ottawa to regain our freedom.”

STORY CONTINUES BELOW

STORY CONTINUES BELOW

Enright said the protests need to maintain their momentum in order to keep pressure on governments. A Facebook group used by the farm protesters has more than 4,000 members.

A planned counter protest by residents fed up by the occupation has been called off because of safety concerns, but some members said they are going to go ahead and demonstrate anyway.

The Alexandra and Portage bridges remained closed Saturday, as did Wellington Street and Queen Streets within the protest “red zone,” the Mackenzie King and Laurier bridges, along with sections of Kent and Bank streets near the protest site.

Police promised a more aggressive posture toward law breakers and criminal offences as part of a new “surge and contain strategy.”

STORY CONTINUES BELOW

At a media briefing Friday, Ottawa police Chief Peter Sloly said the protest “remains a very volatile and very dangerous demonstration” and urged residents to report crimes to a special hotline.

Ottawa Police 
@OttawaPolice

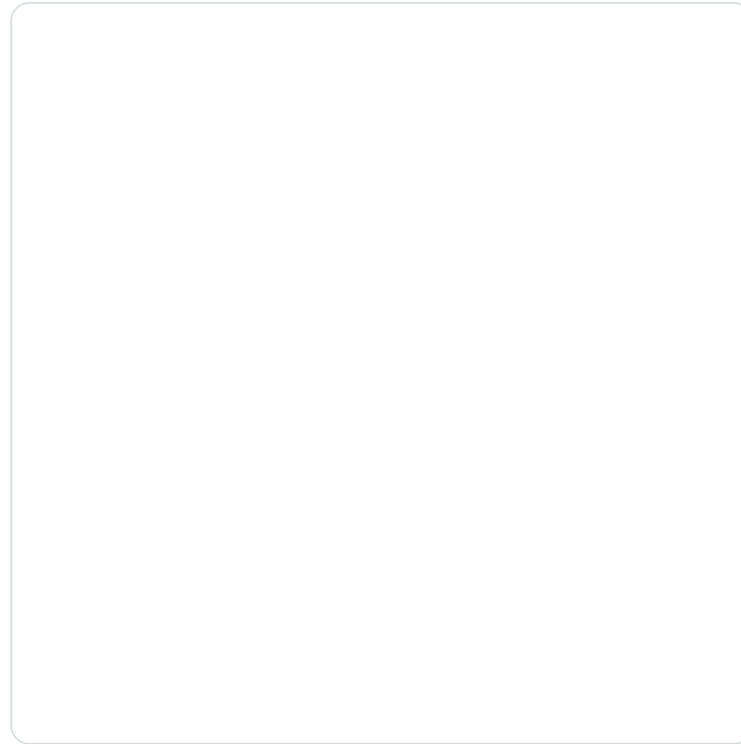


Hate-motivated incidents can be reported to 613-236-1222 ext. 5015.

For life-threatening emergencies or a crime in progress - Call 911.

Please report criminal offences directly related to the demonstrations at 613-236-1222 ext. 7300.

ottawapolice.ca/en/safety-and-...



2:01 PM · Feb 3, 2022



[Read the full conversation on Twitter](#)

♥ 258 💬 Reply ↗ Share this Tweet

[Read 2.5K replies](#)

Security fences have been erected around the Tomb of the Unknown Soldier and National War Memorial, where one protester was seen dancing on the tomb last weekend. A video posted on Instagram Friday night showed fireworks being set off around the memorial.

The Rideau Centre remains closed as do a number of other downtown businesses and restaurants. Hotel staff say they have given up trying to enforce provincial mask regulations because of the number of people ignoring the rule to mask up.

The City of Ottawa continues to advise residents to avoid non-essential travel around the downtown core and says they should expect major traffic impacts and disruptions this weekend across the city.

“The tractors rolling into Ottawa in solidarity with the truckers will greatly bolster their morale,” Enright said, “and send a great symbolic message to the people of Canada and of the world.”

Later on Saturday, Ottawa lawyer Paul Champ will be in court to launch a \$9.8 million class-action lawsuit against organizers of the truckers’ protest, claiming \$4.8 million in damages for emotional, mental and other distress, and \$5 million in punitive damages, largely due to the protestors’ tactic of continually blaring their truck horns.

Champ filed the claim on behalf of plaintiff Zexi Li, a 21-year-old public servant and uOttawa graduate who lives within five blocks of Parliament Hill.

The claim lists convoy organizers Chris Barber, Benjamin Dichter, Tamara Lich and Patrick King as defendants, and leaves room for as many as 60 others who may be identified later.

The claim is seeking class certification, with residents from Bay Street to Elgin Street and Lisgar Street to Wellington Street considered potential members.

Documents filed by Champ contend that the defendants “deliberately planned the horn tactic to cause distress and discomfort” and “are aware or ought to be aware that the prolonged use of the extremely loud air horns and train horns can cause permanent hearing damage and psychological harm.”

According to Champ, an injunction will be heard at 2 p.m. Saturday for an emergency interlocutory order prohibiting the use of truck horns downtown.

After the crowdfunding site GoFundMe [cancelled the protest's fundraising campaign, which had raised more than \\$10 million](#), organizers said they'd switched to a new source of revenue. Tamara Lich, one of the protest organizers, said in a video Friday that they have a new official donation site, the U.S.-based GiveSendGo, which calls itself a "Free Christian Crowdfunding" website.

GoFundMe pulled the campaign Friday, saying it had determined the campaign violated the company's terms of service, particularly those that prohibit the promotion of violence and harassment.

"Organizers provided a clear distribution plan for the initial \$1M that was released earlier this week," read a statement from GoFundMe, "and confirmed funds would be used only for participants who traveled to Ottawa to participate in a peaceful protest. Given how this situation has evolved, no further funds will be directly distributed to the Freedom Convoy organizers."

Donors were initially asked to request any refund, but GoFundMe said in a message Saturday that donors would be refunded automatically within the next seven to 10 days.

Meanwhile, weekend protests in solidarity with the Ottawa event are being organized near provincial legislatures in Toronto, Quebec City, Winnipeg, Regina, and Victoria, as well as the Coutts, Alta., border crossing.

Police forces in those cities say they have learned lessons from Ottawa's predicament and have developed strategies designed to protect key infrastructure, such as vital traffic corridors and hospitals, and also prevent possible violence.

Those strategies have involved significantly boosting the presence of police officers at protest sites, blocking off key access routes and stepping up enforcement of traffic regulations and bylaws regarding excessive noise and other applicable issues. At noon, the protest rally at Queen's Park only numbered a dozen or so.

READ MORE COVERAGE OF THE EVOLVING SITUATION:

['Everybody is at a breaking point': Police board seeks more help as protest strengthens](#)

[Truck convoy: Class action suit claims air horns causing 'unbearable torment'](#)

[Trucker protest noise may lead to 'chronic annoyance and distress'](#)

[Truck convoy: Protest supporters move quickly to new fundraising website](#)

[Ottawa police expecting more trucks, protesters and counter-protesters over the weekend](#)

[UPDATED Trucker convoy: Cities across Canada mobilize as anti-mandate protests spread](#)

[NCC deciding what to do about protest spread, and kitchen shack, around Confederation Park](#)

['An occupation': GoFundMe pulls plug on fundraiser for convoy protesters](#)

['We have to pay rent': Downtown businesses brace for another weekend of protest pandemonium](#)

[Answers to your most common questions on the Ottawa truck protest](#)

-With files from Andrew Duffy, Elizabeth Payne and The Canadian Press



LA

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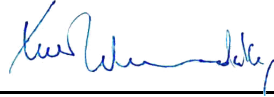
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- 2 Gatineau Hills man jailed for raping his baby
- 3 Millennial dilemma: What is the future of the Ottawa housing market?
- 4 'It was not supposed to end like this': Heatherington homicide victim remembered as sweet and stubborn, a forthright friend and loving mother
- 5 Josh Freed: The slap hurt, but the humiliation hurt more

THIS WEEK IN FLYERS

This is Exhibit "MM" mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



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Feedback

Ottawa Police Enforce Perimeter Containment Measures, Charges laid, new RCMP resources announced

Posted On Saturday February 05, 2022

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FOR IMMEDIATE RELEASE: Saturday, February 5, 2022 6:30pm

(Ottawa) – The Ottawa Police Service and its partners continue to implement a surge and contain strategy focused on preventing and reducing the impacts of demonstrators entering the downtown core, and improving neighbourhood safety.

We continue to advise demonstrators not to enter Ottawa, and to go home.

Enforcement and Charges Laid

- Police have responded to 400 calls for service in relation to the demonstration since they began.
- In total, over 50 criminal offences are being investigated- 11 of those were hate crimes which resulted in charges against four people.
- Seven people have been arrested and 70 traffic violation tickets have been issued so far.

Perimeter and Traffic Control

- An estimated 500 heavy vehicles associated with the demonstration are in the red zone.
- Throughout the day, Ottawa Police and our partners are sporadically closing 417 exits in the downtown area, including:
 - Nicholas / Mann (Westbound & Eastbound)

- Metcalfe (Westbound & Eastbound)
 - Bronson (Westbound)
 - Parkdale (Westbound & Eastbound)
 - Island Park (Westbound)
 - Kent (Eastbound)
 - Vanier (Eastbound)
 - St. Laurent (Eastbound)
 - Pinecrest Road (Eastbound)
 - Montreal Road (Eastbound & Westbound)
 - Woodroffe Avenue (Eastbound & Westbound)
 - Aviation Parkway (Westbound)
 - Walkley Road (Westbound)
- Concrete barriers and heavy equipment barricades remain in place throughout Centretown, Lowertown, ByWard Market, Sandy Hill and the Glebe.

Intelligence and Investigations

- Intelligence and evidence gathering teams continue to collect financial, digital, vehicle registration, driver identification, insurance status, and other related evidence that will be used in criminal prosecutions.
- The Ottawa Police Service is actively working with U.S. authorities to investigate email-based threats to public officials.
- The Hate related Hotline has received over 150 calls, and detectives are ensuring every report is investigated.

Operations

- All available Ottawa Police Service officers remain on active duty, with a focus on patrolling and addressing unlawful and threatening conduct in: Centretown, Sandy Hill, Lowertown and the ByWard Market.
- An additional 257 RCMP officers are being sworn in with Special Constable Status in order to further assist with demonstration enforcement.

We encourage all residents who have witnessed or been the victim of unlawful behaviour to please contact the Ottawa Police at 613-236-1222 ext. 7300, or ext. 5015 for hate related crimes. Reports may also be submitted online at www.ottawapolice.ca.

The Ottawa Police Service will continue to provide updates as they become available.

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CONTACT:

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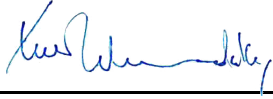
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A handwritten signature in blue ink, appearing to read "Nur Muhammed-Ally", is written over a horizontal line.

A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

Ottawa

No end in sight to Ottawa protests, not enough resources, says police chief

'This is a nationwide insurrection. This is madness,' says police board chair

[Joanne Chianello](#) · CBC News · Posted: Feb 05, 2022 10:41 PM ET | Last Updated: February 6



An Ottawa Police Service cruiser is parked in the downtown Saturday night as protests against COVID-19 public health mandates stretch into their second week. Police said Saturday they currently lack the resources to bring the protest — which some leaders have called an occupation — to an end. (Felix Desroches/Radio-Canada)

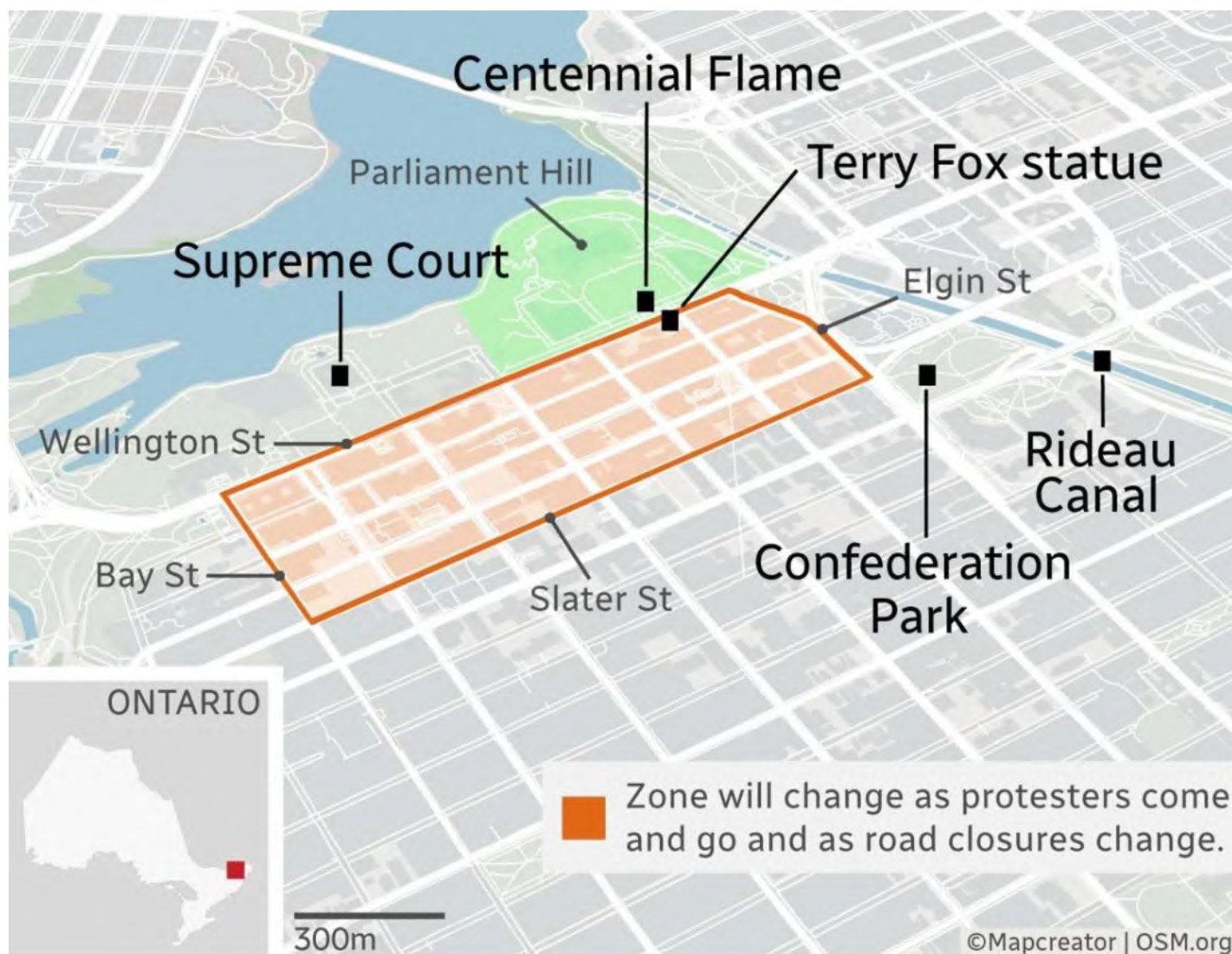
Ottawa's chief of police says he does not have enough resources to end the turbulent protests launched in the nation's capital more than a week ago — nor can he say when they might come to an end.

"We need an additional surge of resources," Chief Peter Sloly said Saturday, even though every available Ottawa Police Service (OPS) officer is on active duty and hundreds of other law-enforcement officials have come to help.

More than 7,000 demonstrators came into the downtown Saturday, according to police, and 500 heavy trucks still remain in the so-called "red zone."

- **Crowds swell in downtown Ottawa again for 2nd weekend of protests**

Sloly made the statement at a rare emergency meeting of the Ottawa Police Services board, one hastily called for late afternoon and which lasted more than two hours.



The approximate area of ongoing anti-vaccine mandate protests in Ottawa. (CBC News)

Coun. Diane Deans, who chairs the board, did not mince words about how she perceives the demonstrations that have taken over the core of the city.

"This group is emboldened by the lack of enforcement by every level of government," said Deans, at one point referring to them as "terrorists."

"They are terrorizing our residents, torturing them with incessant honking, threatening them and preventing them from leading their lives. People [cannot go to work or open their businesses](#). They cannot sleep, walk, shop, go to medical appointments or enjoy their neighbourhood," she said.

"This group is a threat to our democracy. What we're seeing is bigger than just a city of Ottawa problem. This is a nationwide insurrection. This is madness."

Police flooded with complaints

Complaints to police about everything from noise and traffic to threats and assaults have been flooding the reporting channels, to the point some people give up trying.

More than 400 calls have come in since the demonstration began, and police have launched 50 criminal investigations, including 11 related to hate crimes.

Four people have been charged in relation to those hate-crime investigations, bringing the total number of charges to seven.

- [Demonstrators don't have unlimited rights to clog up downtown, experts say](#)

They've even issued 70 traffic violations, for infractions like driving the wrong way on a one-way street.

Board members pressed upon Sloly many of the questions on the public's mind: Why aren't laws and bylaws being enforced? When will arrests be made? Why is a shack illegally built at

Confederation Park not taken down yet? Why is the city-owned parking lot at the baseball stadium being used as a base camp for the protest?

"What's going to be done here?" demanded a furious Coun. Carol Anne Meehan, who sits on the board. "We're giving a signal to everyone coming into town that it's a free-for-all."



'This can't continue': Ottawa city councillor pushes police to find way to end protests

2 months ago | 3:11

During an emergency meeting of the Ottawa Police Services Board, Coun. Carol Anne Meehan expressed frustration with Ottawa police over their response to week-long protests that have pushed local residents to the breaking point. 3:11

Not a reasonable crowd, says deputy

Both the police and the National Capital Commission have been criticized for not removing the hastily erected wooden shack on the NCC-controlled park.

But acting Deputy Chief Trish Ferguson said both laws and judgment have to be considered, as police believe that situation could become dangerous quickly.

- [Police, fire officials monitoring protest camp for 'public safety concerns'](#)

In the case of the shack, police had to get permission from the NCC, which owns the property, to remove the structure. That took a little time, but then there was a claim by some protesters that it was part of an Indigenous demonstration. So police then had to consult with local Indigenous leaders to determine if that claim was valid.

Apparently it was not, but even so, Ferguson said police have to assess whether anyone might get injured if officers move in, even if they are legally in the right.

"I know everybody is looking to Confederation Park saying, 'Why don't you just go in there with bulldozers and take it down?' There were children [there], there were women," she told the board.

As for board members' suggestions that protestors be ticketed for all the infractions they're committing — idling, parking, violating noise bylaws — Ferguson said she's not sure what good it would do.

"If we're dealing with reasonable people, then it is a deterrent," she said. "But this is not the crowd that we're dealing with."

Protesters walk around trucks parked in Ottawa's downtown core in protest of COVID-19 restrictions on Feb. 5, 2022. (Adrian Wyld/The Canadian Press)

Mistakes were made, admits chief

Police have now conceded they were not expecting protesters to stay this long.

Deputy Chief Steve Bell said the intelligence coming in from security partners across the country when the convoys first set off was that they would stay a short time and leave — just like every other protest that has come to Ottawa.

According to CBC sources, the seven or eight convoy leaders in contact with police indicated most of the trucks would roll out last Sunday. That clearly didn't happen.

"This is an unprecedented situation, but we have learned from our experience and yes, our mistakes, and we're committed to doing better," said Sloly.

The chief did not elaborate on precisely what those mistakes were, but it may have included offering to hand over the parking lot of the baseball stadium to the demonstrators more than a week ago.

The idea at the time was to get the trucks out of the downtown.

But demonstrators soon organized themselves into a semi-permanent camp at the Coventry Road lot, where huge donations of food and fuel are distributed to protesters, some of whom sleep in their trucks.

Many of them eat together in large white tents. They have bonfires at night. They've even installed three working saunas.

Now, police are worried about how to move the protesters, literally invited there by city officials, without a dangerous conflict.

Saunas are set up in a Coventry Road parking lot where many protesters against COVID-19 mandates have set up an encampment on Feb. 5, 2022. (Joanne Chianello/CBC)

All resources on the streets, curfew suggested

The board heard that virtually every one of the 500 available OPS officers is working 12-and-14-hour shifts, with any booked time off cancelled. Sloly said some haven't had a day off in almost two weeks, a situation that cannot continue indefinitely, even though the protest does.

Ontario Provincial Police Commissioner Tom Carrique has helped — "There's nothing we have asked for that he hasn't given and he's offered even more today," said the chief — as has RCMP Commissioner Brenda Lucki.

The federal police force has been working with the OPS since the demonstration began, with another 257 RCMP officers joining the local ranks to help with demonstration enforcement as of Saturday.

Police say they need more help with everything, from investigating complaints to following the digital tracks of organizers to finding enough tow trucks.

"We need tow trucks. We need heavy tow trucks. There are not enough in this in the city, not the availability through private sector. That will be a significant issue should we start to try to challenge the full breadth of what's going on with horn blowing," Sloly said.

"Ultimately, we're going to have to potentially seize and impound vehicles ... That's another significant resource we need very quickly."

The board asked the chief to deliver a list "as soon as possible" of additional resources that he might need. Deans even floated the idea of asking the province to impose a curfew.

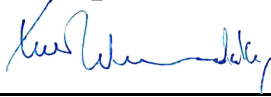
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protests

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Vancouver Police arrest five during day-long protests

5 February 2022 | [News Releases](#)

Vancouver – Vancouver Police made five arrests Saturday as thousands of protesters flooded the downtown core, caused traffic gridlock, and sparked skirmishes throughout the city.

“Everyone has the right to peacefully assemble and express their views, and the Vancouver Police Department is committed to providing a safe environment for lawful protest,” says Sergeant Steve Addison. “Today’s protests attracted thousands of people who feel passionately about their causes. While most protesters were peaceful, some had to be arrested for violent behaviour and unlawful conduct.”

VPD received numerous reports of rocks and eggs being thrown, cars being kicked, and nails being strewn on roadways as several hundred vehicles travelled through the city en route to a planned demonstration in the downtown core. Police officers worked throughout the day to mitigate traffic disruptions and resolve conflicts between the vehicle convoy, counter-protesters, and Vancouver residents concerned about noise, disorder, and violence.

[Emergency 911](#)[I Want To ...](#) ↓

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the man down and repeatedly encouraged him to leave the roadway, however, officers were forced to arrest him when his behaviour threatened to incite onlookers.

- A 57-year-old man was arrested for mischief after he was seen kicking vehicles near Burrard and Davie Street.
- A 30-year-old man was arrested when VPD officers observed him walking through a crowd of protesters and challenging people to fights.
- A 28-year-old man was arrested for mischief near Nelson and Burrard Street after witnesses flagged down VPD officers and reported he was throwing eggs.

Everyone who was arrested was transported to the Vancouver Jail and has now been released from custody.

Share this story



VPD Headquarters

2120 Cambie Street

Vancouver, B.C.
Canada V5Z 4N6

VPD Mailing Address

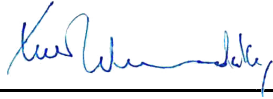
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Business & Innovation | Feb 6, 2022

Statement regarding the ongoing closure of CF Rideau Centre

CF Rideau Centre has been closed since Saturday, January 29, 2022.

Business & Innovation > **Statement regarding the ongoing closure of CF Rideau Centre**

CF Rideau Centre has been closed since Saturday, January 29, 2022 as a result of ongoing public safety issues related to demonstrations surrounding Parliament Hill.

From the start of this situation, we have had ongoing engagement with City of Ottawa officials and the Ottawa Police Service. Throughout this time and as of Sunday, February 6, Cadillac Fairview has been advised that authorities cannot provide any assurances that it is safe to reopen or that the police service would be able to assist our security personnel in maintaining public order and safety within and around CF Rideau Centre.

As a result, CF Rideau Centre remains closed and conditions for reopening will be evaluated on a daily basis in collaboration with our community partners.

While our shared primary concern remains public safety and the safety of those that work within CF Rideau Centre, we are increasingly concerned about the economic impact and financial burden for the thousands of employees and 175 businesses that call CF Rideau Centre home.

The continued closure of an important community space, the loss of employment income, and the financial impact on our clients is heart-breaking given all of our shared pain and sacrifice during the pandemic.

The situation in Ottawa's downtown core is untenable and we call on all levels of government to collaborate on a solution.

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PARTNERSHIPS | Mar 11, 2022

Thomas White Oxford agrees joint venture with Cadillac Fairview and Stanhope to deliver Oxford North

A new company, Oxford North Ventures LLP, has been formed as a joint venture, 50% owned by Thomas White Oxford and 50% by Cadillac Fairview and Stanhope.

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COMMUNITY & PHILANTHROPY | Mar 3, 2022

A Statement on the Ukraine Crisis

The current conflict in Ukraine and the impact on Ukrainian communities across Canada and around the world is staggering.

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BUSINESS & INNOVATION | Feb 11, 2022

Cadillac Fairview takes note of the interim control resolution of the City of Pointe-Claire and evaluates its options

We sincerely hope that this relationship can continue, for the benefit of the entire Pointe-Claire community.

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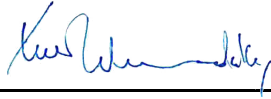
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ER



Mayor Watson declares state of emergency for Ottawa due to ongoing demonstration

February 6, 2022

Announcements and Events

Mayor Jim Watson today declared a state of emergency for the City of Ottawa due to the ongoing demonstration.

Declaring a state of emergency reflects the serious danger and threat to the safety and security of residents posed by the ongoing demonstrations and highlights the need for support from other jurisdictions and levels of government. It also provides greater flexibility within the municipal administration to enable the City of Ottawa to manage business continuity for essential services for its residents and enables a more flexible procurement process, which could help purchase equipment required by frontline workers and first responders.

Residents can continue to visit ottawa.ca or follow us [Facebook](#) and [Twitter](#) for the latest information updates and developments.

For more information on City programs and services, visit ottawa.ca, call 3-1-1 (TTY: 613-580-2401) or 613-580-2400 to contact the City using Canada Video Relay Service. You can also connect with us through [Facebook](#), [Twitter](#) and [Instagram](#).

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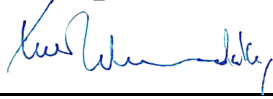
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Local News

Province says Ottawa has tools needed to end convoy protest; Watson warns city authorities 'outnumbered' by protesters

Elizabeth Payne
Feb 06, 2022 • February 7, 2022 • 4 minute read



Trucks lined streets in Centretown Sunday afternoon. PHOTO BY ASHLEY FRASER /Postmedia

While increasingly desperate Ottawa officials look to other levels of government for help ending truck protest, the province is sending a message that Ottawa police have all the tools and resources they need to do the job themselves.

STORY CONTINUES BELOW

On Sunday afternoon Premier Doug Ford underscored that message on Twitter, saying: “While we cannot direct the police, we have provided the city of Ottawa everything they have asked for and will continue to provide whatever support they request.”



And in a statement released later in the day Sunday, Solicitor General Sylvia Jones said police in Ottawa have the authority to take the necessary steps to manage the protest and arrest people that have committed crimes.

“I want to stress that policing protests is a responsibility carried out by local police services across Ontario, who have the resources and authority to ensure their communities remain safe. Politicians at all levels cannot direct the police,” read the statement.

STORY CONTINUES BELOW

“To be clear: police services, including the Ottawa Police Service, have full discretion and extensive existing legislative authority under the Criminal Code to respond to and manage demonstrations and take enforcement action, as appropriate, against any individuals committing crimes in their jurisdiction.”

Jones also noted that police officers from other agencies in Ontario have been called in to help with the protest, including more than 1,500 officers from the Ontario Provincial Police. The RCMP has also deployed members to the protest in Ottawa.

“Officials from my ministry have been in contact with Ottawa officials throughout, and both the Premier and I have regularly reiterated the province’s commitment to support them with any additional operational resources they may need,” she added.

STORY CONTINUES BELOW

During an emergency police board meeting Saturday, Ottawa’s beleaguered police chief, Peter Sloly, said his force does not have the resources it needs to handle what has become an unprecedented nine-day occupation in the city. Police officials said the extent of the protest was not anticipated, even in a city used to handling frequent protests.

Mayor Jim Watson said on Sunday that the city was “outnumbered” and “losing the battle” against the truckers’ protest that had laid siege to the city for more than a week.

Speaking on CFRA radio Sunday morning, the mayor added that the protestors were “calling the shots.”

“The situation at this point is completely out of control, because the individuals with the protest are calling the shots. They have far more people than we have police officers, and I’ve indicated to the chief that we have to be much more nimble and proactive when it comes to these activities.”

STORY CONTINUES BELOW

Watson added, too, that he didn't know when the protest might end.



“It should have ended days ago, there’s no question about that. The nerves of the residents, particularly in the downtown core, are frayed beyond belief. They are suffering, and the protesters do not seem to have any understanding of how insensitive they are, blaring horns and sirens and fireworks, and turning it into a party. ... Bringing in bouncy castles and saunas and hot tubs is the height of irresponsibility.”

Watson noted that 60 new RCMP officers had been sworn in on Saturday to help manage the protest, and that more were expected to be added Sunday or Monday, bringing the total to more than 250.

“Clearly, we are outnumbered and we are losing this battle right now,” he said. “This has to be reversed; we have to get our city back.”

STORY CONTINUES BELOW

Watson pointed to instances, such as when protestors were allowed to build a shack on property between Confederation Park and the Rideau Canal, as unacceptable.

“There should’ve been action taken while the shack was being constructed, and now it’s become a rallying point where there are so many people there, how do we go in and enforce the laws and the NCC’s property rights?”

Coun. Mathieu Fleury, who represents some of the core neighbourhoods, including ByWard Market and Lowertown, most affected by the protest, said the situation has not improved and he is receiving hundreds of complaints daily about micro aggressions and other issues that require enforcement.

“There is a siege in our city there is an occupation the city and police have said this is bigger than us, we can’t handle it. We need provincial and federal intervention.”

STORY CONTINUES BELOW

READ MORE COVERAGE OF THE STANDOFF IN DOWNTOWN OTTAWA:

[Truck Convoy: People bringing ‘material’ supports to protesters—including gas—could be subject to arrest; Some protesters relocating from Confederation Park](#)

[‘Everybody is at a breaking point’: Police board seeks more help as protest strengthens](#)

[Trucker protest noise may lead to ‘chronic annoyance and distress’](#)

[Truck convoy: Protest supporters move quickly to new fundraising website](#)

[Ottawa police expecting more trucks, protesters and counter-protesters over the weekend](#)

[UPDATED Trucker convoy: Cities across Canada mobilize as anti-mandate protests spread](#)

[NCC deciding what to do about protest spread, and kitchen shack, around Confederation Park](#)

[‘An occupation’: GoFundMe pulls plug on fundraiser for convoy protesters](#)

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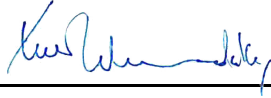
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THIS WEEK IN FLYERS

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450+ tickets issued since Saturday morning

Posted On Sunday February 06, 2022

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FOR IMMEDIATE RELEASE: Sunday, February 6th, 2022 11:45am

(Ottawa) – The Ottawa Police Service and its partners worked through the night to reduce the impacts of demonstrators in the downtown core, respond to calls for service, and improve neighbourhood safety.

Overnight, demonstrators exhibited extremely disruptive and unlawful behaviour, which presented risks to public safety and unacceptable distress for Ottawa residents.

We continue to advise demonstrators not to enter Ottawa, and to go home.

As of 11:00Am EST, the Ottawa Police Service can report:

Enforcement and Charges Laid

- Police have responded to over 650 calls for service in relation to the demonstrations since they began.
- Bylaw and Police Services have issued more than 450 tickets since Saturday morning, including tickets for the following:
 - Excessive noise
 - Use of Fireworks
 - Failure to drive in marked lane
 - Red light violations
 - Driving through a No Truck Route
 - Seatbelt violation
 - Driving a motor vehicle on a sidewalk
 - Cellphone
 - Disobey sign
 - Improper muffler
 - Tint (too dark)
 - Obstructed license plate
 - Failure to produce documents
 - Stunt Driving (vehicle seized)
 - Suspended license
 - No Insurance

- Several vehicles were seized and towed, including one stolen truck and an abandoned vehicle in a roadway.
- Ottawa Police Service Negotiators supported efforts to limit noise and the blowing of horns from 9AM to 1PM EST today.

Perimeter and Traffic Control

- Overnight, there was a peak attendance of 250 people in the Wellington Corridor and a large crowd of 350 people at Rideau and Sussex.
- As of 9:00AM there were 100 demonstrators in the Wellington Corridor and 500 vehicles in the red zone.
- Ottawa Police and our partners continue to close 417 exits in the downtown area sporadically.
- Kent St. remains blocked with traffic between Wellington and Somerset.
- Hundreds of concrete and heavy equipment barricades remain in place throughout Centretown, Lowertown, Byward Market, Sandy Hill and the Glebe.

Intelligence and Investigations

- 97 criminal offence investigations have been opened in relation to the demonstration.
- Intelligence and evidence gathering teams continue to collect financial, digital, vehicle registration, driver identification, insurance status, and other related evidence that will be used in criminal prosecutions.
- The Ottawa Police Service is actively working with Canadian, U.S. and international security agencies authorities to investigate email-based threats to public officials.
- The Hate-motivated crime hotline has received over 200 calls, and Detectives are ensuring every report is investigated.

Operations

- Public Order Units managed a large unlawful crowd at Rideau/Sussex at 12:30 AM.
- All available Ottawa Police Service officers remain on active duty, focusing on patrolling and addressing unlawful and threatening conduct in Centretown, Sandy Hill, Lowertown and the ByWard Market.

We encourage all residents who have witnessed or been the victim of unlawful behaviour to please contact the Ottawa Police at (613) 236-1222 ext 7300, or ext 5015 for hate related crimes. Reports may also be submitted online at www.ottawapolice.ca.

The Ottawa Police Service will continue to provide updates as they become available.

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Feedback

7 people arrested, 100 tickets issued in Demonstration-Related Enforcement

Posted On Sunday February 06, 2022

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FOR IMMEDIATE RELEASE: Sunday, February 6, 2022 9:06pm

(Ottawa) – The Ottawa Police Service has made multiple arrests in relation to several enforcement actions related to the ongoing demonstration.

On Sunday:

- Two people were arrested on Coventry Rd. for mischief
- Multiple vehicles and fuel have been seized.
- Officers arrested three individuals at Metcalfe and Slater for mischief. The investigation is ongoing and updates will follow.
- Two more people were arrested this morning. One person was charged for driving while prohibited and the other for mischief relating to property damage of a downtown business.
- The OPS issued a warning earlier today advising the public that anyone found bringing fuel to the demonstration trucks in red zone could be subject to arrest and charges. This is effective immediately.
- Confederation Park has been fully cleared and fenced.
- More than 100 Highway Traffic Act and other Provincial Offence Notices were issued including excessive honking, driving the wrong way, defective muffler, no seat belt, alcohol readily available and having the improper class of driving licence.

Further updates and charges will follow tomorrow.

There are over 60 criminal investigations so far related to the demonstration. They are primarily for mischief, thefts, hate crimes and property damage.

To date, the Ottawa Police Service has received 100 Ontario Provincial Police officers to assist with Ottawa demonstrations. We thank them and our other policing partners for their continued support.

- 30 -

CONTACT:

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Tel: 613-236-1222, ext. 5366

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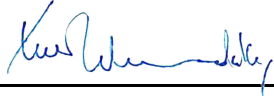
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NEWS

Canada: Ottawa declares state of emergency amid COVID-19 protests

Thousands of protesters opposed to COVID restrictions descended on the Canadian capital over the weekend. Ottawa's mayor has said the situation is "completely out of control."



Thousands descended on Ottawa over the weekend

The mayor of Canadian capital Ottawa declared a state of emergency on Sunday amid [trucker protests against COVID-19 restrictions](#).

Thousands of protesters descended on Ottawa on the weekend, joining a hundred who remained from last weekend.

The demonstrations began as truckers protested against vaccine requirements when [crossing the border between the US and Canada](#), and later turned into a broader protest against COVID-19 restrictions and [Prime Minister Justin Trudeau's government](#).

Last week, crowdfunding site [GoFundMe pulled funds for the protests](#).

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COVID: TRUCKERS' PROTEST CONVOY PARALYZES OTTAWA — IN PICTURES

Angry truckers

The protest in Ottawa began when a convoy of truckers reached the city on January 29 after a dayslong journey. They were angry at being required to be vaccinated against COVID-19 to cross the US-Canadian border.

party."

Mayor Jim Watson said that the declaration highlights the need for support from other jurisdictions and levels of government.

The declaration gives the city additional powers around procurement and how it delivers services, and may also help the city purchase equipment required by front-line workers and first responders.

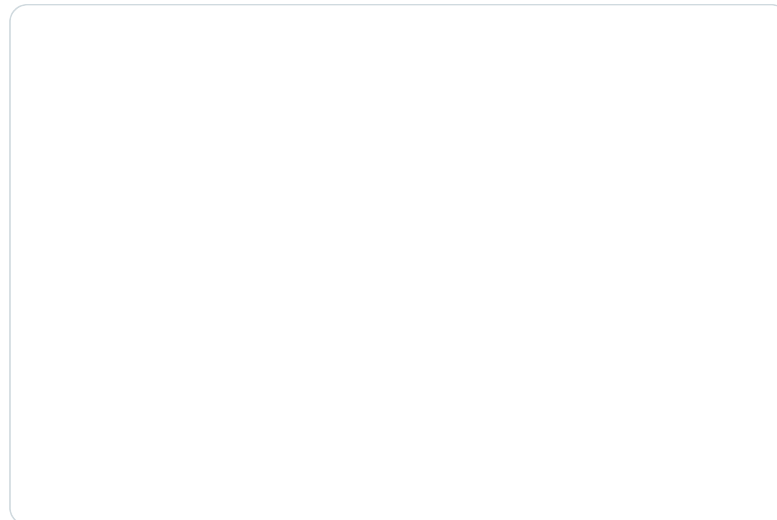
Earlier in the day, Watson had described the situation as "completely out of control."

"Clearly, we are outnumbered and we are losing this battle," Watson told local radio station CFRA.

Watson also called the truckers "insensitive," criticizing the noise produced by the protests. According to Watson, protesters have continued "blaring horns and sirens and fireworks, and turning it into a

Ottawa Police 
@OttawaPolice

IMPORTANT: Anyone attempting to bring material supports (gas, etc.) to the demonstrators could be subject to arrest. Enforcement is underway. [#ottawa](#) [#ottnews](#)



1:52 PM · Feb 6, 2022



Meanwhile, police announced new measures to stop people from helping the protesters.

"Anyone attempting to bring material support (gas, etc.) to the demonstrators could be subject to arrest," Ottawa's police force tweeted.

Police also said that they had issued more than 450 tickets since Saturday.



'A nationwide insurrection'

Similar demonstrations hit Toronto, Quebec City and Winnipeg on Saturday.

[Police in Quebec City](#) said some 30 big trucks were blocking a major artery and had been warned they would face fines if not moving soon.



City council member Diane Deans said that the protests are "bigger than just a city of Ottawa problem, this is a nationwide insurrection."

On Saturday, Ottawa police chief Peter Soly called the demonstrations a "siege" and asked for reinforcements.

The federal Canadian Mounted police are due to send reinforcements of 250 officers to Ottawa.

Ottawa declares state of emergency over COVID-19 protest

US Republican support for the protests

The trucker protests have drawn support from members of the US Republican Party, including former President Donald Trump. Trump called Canada's Prime Minister Justin Trudeau a "far-left lunatic" who has "destroyed Canada with insane COVID mandates."



On Sunday, a former US ambassador to Canada denounced such statements, saying the US should stop interfering in the domestic affairs of its neighbor.

"Canada-US relations used to be mainly about solving technical issues," Hayman tweeted.

sdi/aw (AP, AFP, Reuters)

DW RECOMMENDS

Canada: Ottawa declares state of emergency amid COVID-19 protests

Thousands of protesters descended in Ottawa over the weekend. Ottawa's mayor said that the situation was 'completely out of control.'

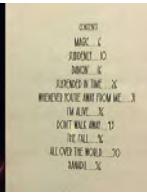
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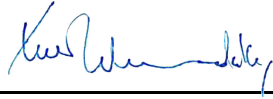
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Ottawa

Centretown ice cream shop closes after worker reports assault on way to work

Employee said 2 men hurled racial slurs before shoving them to the ground

[Kimberley Molina](#) · CBC News · Posted: Feb 07, 2022 4:00 AM ET | Last Updated: February 7



Liz Mok, seen in a photo from 2019, is the owner of Moo Shu Ice Cream & Kitchen in Ottawa. She said she's had to close her business for the past two weekends because of the protests in Ottawa's downtown and after an employee was assaulted on their way to work Friday. (Halima Sogbesan/CBC)

The owner of a downtown Ottawa ice cream shop decided to close its doors again this weekend after an employee said they were assaulted on their way to work.

The employee said they left their home in the Sandy Hill neighbourhood across the Rideau Canal from downtown early Friday morning on their way to work at Moo Shu Ice Cream & Kitchen on Bank Street.

But only a short distance from their home, the employee — whom CBC is not naming because of concerns for their safety — said they were approached by two men who hurled racial and other slurs and harassed them for wearing a mask.

"They were yelling racially charged slurs at me and asking me if the reason that I had my mask on was because I was an anti-Asian slur," they said.

"Essentially [they were] treating me like an Asian person who was going to give other people COVID just for just existing."

The employee said the verbal harassment continued before they were shoved to the ground and the two men ran away.

Immediately after the assault, the employee said they called the Ottawa police hate crime unit, which the service [has been often sharing during the ongoing protest in the shop's neighbourhood](https://www.cbc.ca/news/canada/ottawa/moo-shu-ice-cream-employee-assaulted-ottawa-1.6341207).





Moo Shu Ice Cream & Kitchen has been closed since Friday, the second weekend in a row the owner shuttered its doors because of safety concerns relating to the protest in downtown Ottawa. (Drake Fenton/CBC)

They hung up after trying for 15 minutes to get through and said they plan to file a police report through a community officer.

"I feel really angry that people feel emboldened to assault somebody for simply wearing a mask," the employee said. "I feel angry that, you know, the most vulnerable members of our community right now are faced with all these different assaults."

As of Sunday morning, Ottawa police said its hate-motivated crime hotline had received more than 200 calls.

Protest scary, disruptive, says owner

Moo Shu's owner Liz Mok said she was shocked by the assault. She decided to close up shop early Friday evening and stay closed for a second straight weekend after hearing concerns from other employees.

- [**From Feb. 4: Thousands in lost revenue, wages as protest hits one-week mark**](#)

"We've operated in Centretown for six years now, we've seen lots of protests and demonstrations and it's never been disruptive," Mok said.

"I don't think that we thought it was going to feel as scary or as disruptive as [it's been] and then we also didn't anticipate it to last so long."

“I don't think that we thought it was going to feel as scary or as disruptive as [it's been] and then we also didn't anticipate it to last so long.”

- Liz Mok, owner of Moo Shu Ice Cream and Kitchen

After posting the reason for closing on social media Friday, Mok said there were many messages of support — along with a stream of messages accusing the business of lying for attention, something she found silly.

"I don't think anybody would want to go through that or put themselves through this type of scrutiny ... I don't know what there is to gain from that," Mok said.

Mok plans to reopen Wednesday, but hopes the time will soon come when they can go back to selling ice cream and not have to be "hypervigilant about, like, being yelled at or being called out."

Moo Shu Ice Cream @MooShulceCream · Feb 4, 2022



We are closing early tonight (Friday) at 6:30pm and staying closed over the weekend until Wednesday Feb 9th 🙌. One of our staff was physically assaulted on their way to work today, blocked on the sidewalk by two men and shoved to the ground for wearing a mask.

Moo Shu Ice Cream

@MooShulceCream

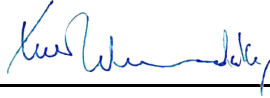
Based on the accounts we've heard from our neighbours, this behaviour is not an isolated incident. It's taken the day for us to let it sink how not OK we are. Please pardon the last minute change, and we're sorry if you braved a

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OTTAWA | News

Protesters quickly adapting to police measures: Ottawa chief



Police Chief asks for 1,800 officers and civilians



Ottawa Police Chief: This is unsustainable



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Updated Feb. 7, 2022 8:26 p.m. EST
Published Feb. 7, 2022 4:00 a.m. EST

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Ottawa Police Chief Peter Sloly says protesters are countering any police actions to bring an end to the "Freedom Convoy" demonstration that has occupied the downtown core of the nation's capital for 11 days, with no signs of ending.

Speaking on CTV News at Six Monday evening, Sloly said demonstrators are adapting quickly to any enforcement efforts, such as disallowing fuel containers into the downtown core.

"What was happening during the course of the day is some of the protesters were deliberately filling jerry cans with water, literally drinking out of them to show the police that they weren't gasoline," Sloly said. "Meanwhile, they were carrying gasoline in other containers that would have been carrying water."

Police made the announcement Sunday that fuel would not be allowed into the protest "red zone" and that anyone bringing supplies to the protest could face arrest. It came hours before police seized thousands of litres of fuel from a staging area on Coventry Road.

RELATED STORIES

- [Ottawa residents, honking protesters scheduled to clash in court](#)
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- [Police target fuel supply for 'Freedom Convoy' demonstration in Ottawa](#)
- [Several people arrested for bringing gas to 'Freedom Convoy' demonstrators in Ottawa, police say](#)
- [CF Rideau Centre will remain closed as 'Freedom Convoy' protest continues in downtown Ottawa](#)

Sloly said the countermeasures speak to the "sophistication and commitment" of the operation, as demonstrators appear able to pivot en masse in reaction to police efforts.

The police chief also said officers were swarmed at one point during an attempted arrest.

"Our officers were surrounded by over 100 demonstrators," he said. "A near-riot broke out within minutes of being on the air here, to do what we've been saying we doing: enforcing and reducing the fuel

supply, interdicting the gasoline going in there—at great risk in every single encounter."

Speaking to reporters later in the evening, Deputy Police Chief Steve Bell said an investigation into the incident is underway, an arrest was made and charges are pending.

Sloly pushed back against comparisons to other cities that have had similar protests, such as Toronto and Quebec City.

"Deputy minister Mario Di Tommaso, on a call today with the three levels of government said, 'Hey, Peter, what do you think about using heavy tow trucks to remove the trucks that are in your town? Toronto did it. They did it on the weekend. They had one tow truck go out and confront six trucks and the six trucks left.' I said, 'Well, I have two heavy tow trucks here from the city and I had a thousand trucks on Saturday and last Saturday, I had 3,000 trucks,'" Sloly said. "That's like comparing Pluto the Sun, in terms of the scale and the complexity and the violence that this city has experienced, compared to other jurisdictions. This is a completely different beast that we're dealing with here in Ottawa."

Police estimate between 400 and 500 trucks remain in the downtown core. Sloly has asked other levels of government for [1,800 additional police officers](#) and civilian staff. For comparison, the full size of the Ottawa Police Service is 2,100 members.

CITY SEEKING STRONGER FINES

The City of Ottawa has asked the Chief Justice of Ontario to increase the value of fines being issued to protesters with the "Freedom Convoy" demonstration that has occupied the downtown core for 11 days and counting.

In opening remarks to a special meeting of city council, Mayor Jim Watson said the penalties for some of the demonstration's tactics would be increased.

Watson said the fine for idling would increase to \$1,000 from \$100, the fine for violating the noise bylaw would increase to \$1,000 from \$490 and the fine for encumbering a roadway would be increased to \$1,000 from \$350.

"Chief bylaw officer Roger Chapman has confirmed that the Chief Justice of Ontario is supportive of our request and is committed to enacting these higher fines as soon as possible," Watson said.

POLICE CHIEF REQUESTING SURGE OF 1,800

PERSONNEL

Ottawa police chief Peter Sloly told city council he was seeking a major surge in resources, requesting 1,800 police officers and civilian staff to help manage the ongoing demonstration and occupation downtown.

"To put that into some perspective, the entire amount of members of the Ottawa Police Service is 2,100. The entire amount of police officers in the Ottawa Police Service is 1,200. We are asking for 1,800 of police and civilian resources for our immediate use within our incident command umbrella," he said.

Sloly said so far, the RCMP has sent 257 officers and the OPP has sent an average of 100 additional officers per day over the last week.

"We are asking for more. It is not enough. It is not sustainable," Sloly said, as he thanked RCMP Commissioner Brenda Lucki and OPP Commissioner Thomas Carrique for their support. Sloly also expressed his gratefulness for support from municipal forces from eastern Ontario, the GTHA and the Niagara Region.

"This unacceptable and unlawful demonstration must end," Sloly said.

On Saturday, Ottawa's police chief admitted the force doesn't have enough resources to address the situation.

"We do not have sufficient resources to adequately and effectively address this situation while adequately and effectively providing policing in this city," said Chief Peter Sloly during [a special Ottawa Police Services Board meeting](#).

According to [a letter to Prime Minister Justin Trudeau](#) and Public Safety Minister Marco Mendicino, the city is seeking 1,000 regular officers, 600 public order officers, 100 investigative officers, 100 civilian staff and "all supporting resources." The same request was made in a letter to Ontario Premier Doug Ford and Solicitor General Sylvia Jones.

"We ask the Government of Canada and the Province of Ontario to work with us to secure this combined officer surge from the Government of Canada, the Province of Ontario and municipal police forces willing to participate from Ontario and other provinces," the letters say.

WATSON ASK FOR MEDIATION BETWEEN FEDS, PROTESTERS

Watson earlier called on the Prime Minister Justin Trudeau's government to appoint a mediator in an effort to end the 'Freedom

Convoy' occupation in the city's downtown.

He said he has suggested to federal ministers that a mediator could be "an honest broker on both sides to try to find some common ground, if that's possible."

"Someone of great stature in our community and the country who can actually open doors and bring some peace and calm to the situation," Watson told CTV Morning Live. "That's one option that I think the federal government should pursue, because right now we're at a complete standoff."

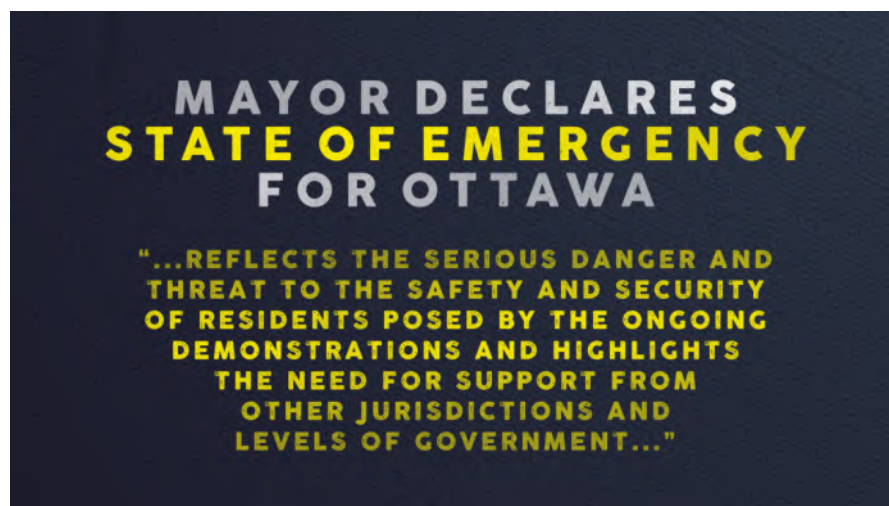
Watson's suggestion comes ahead of a special council meeting Monday afternoon, with the ongoing demonstration entering an 11th day. You can watch the meeting here starting at 1 p.m.

The meeting comes as officials hope increased enforcement by police will lead to a turning point in efforts to end the occupation.

Police moved to cut off the supply of gasoline, propane and other "material supports" to the demonstrators on Sunday, seizing more than 3,000 litres of fuel at the Ottawa Baseball Stadium and threatening to arrest anyone bringing supplies into the downtown area.

Seven people were arrested during enforcement initiatives targeting the demonstration on Sunday, while more than 100 tickets were issued for Highway Traffic Act offences.

On Sunday, Watson declared a state of emergency due to the ongoing demonstration, giving the city the "administrative tool" to cut red tape in the procurement policy.



Mayor Jim Watson declared a state of emergency in his city on Sunday, Feb. 6, 2022 in the face of ongoing protests that have overwhelmed local resources shortly before police moved to choke the convoy's supply chain.

Watson told CTV News Ottawa police are now taking a "more aggressive stand."

"They have to be much more aggressive in terms of these fines. Someone is going to get killed or seriously injured because of the irresponsible behaviour of some of these people who are honking their horns and destroying the fabric of neighbourhoods," Watson said.

"At the end of the day, it's going to be a combination of enforcement, to a certain degree, as well as compromise and cutting off the supply lines of these people," he said. "We can't allow them to have barbecues and turn this into a real carnival. It's an absolute disgrace."

The Rideau Centre, Ottawa City Hall and the Rink of Dreams, two public library branches and two COVID-19 vaccination clinics remain closed due to the ongoing road closures and traffic gridlock in the downtown core.

Cadillac Fairview, which owns the Rideau Centre, said in a statement that authorities "cannot provide any assurances that it is safe" to open the mall.

At the council meeting, Coun. Catherine McKenney expects councillors to move several motions during the special council meeting. McKenney will table a motion asking the federal government to take over policing of the Parliamentary Precinct.

"I need to see the federal government assume operation control for the Parliamentary Precinct," said McKenney during an interview on Newstalk 580 CFRA. "We can request that; they can't just move in but we can make that formal request and that would then free up all of our local police to turn their attention into the residential areas that are under occupation in the city."

INJUNCTION GRANTED AGAINST USE OF HORNS

A 10-day injunction against the constant honking as part of the protest has been granted by a judge.

A \$9.8 million class-action proposed lawsuit was filed by local lawyer Paul Champ on behalf of residents in Ottawa affected by the ongoing demonstration.

Superior Court Justice Hugh McLean heard the arguments Monday afternoon and granted an injunction for 10 days.

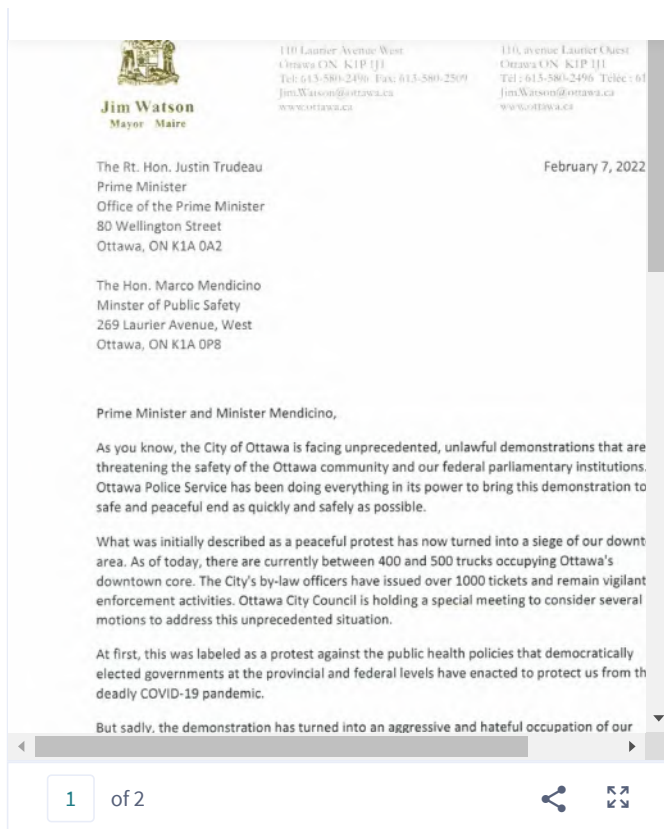
Lead plaintiff in the class action suit, Zexi Li, told CTV News Channel

on Monday that living in the downtown core has been "unbearable" these past 11 days.

"There are people who have had to evacuate their homes because they can't stand the noise because it is literally, quite literally, torturous to us," Li said. "And we are not going to stay quiet anymore because people need to understand the real damage this is doing to real people."



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"Some of the protesters were deliberately filling jerry cans with water, literally drinking out police that they weren't gasoline," Police Chief Sloly said. "Meanwhile, they were carrying containers that would have been carrying water."

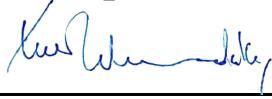
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News | Coronavirus pandemic

Canada's NDP leader says trucker convoy aims to 'overthrow' gov't

Jagmeet Singh calls for emergency debate in Canadian parliament over ongoing trucker 'occupation' of capital, Ottawa.



The so-called 'Freedom Convoy' was organised by known far-right figures in Canada [File: Lars Hagberg/Reuters]



Canada needs to investigate foreign interference and support for [an anti-government protest](#) in the country's capital, said New Democratic Party (NDP) leader [Jagmeet Singh](#), as the convoy of truckers and their supporters continues to wreak havoc in Ottawa.

Speaking to reporters on Monday morning, Singh said the convoy's stated intent is to "overthrow the government".

KEEP READING

Canada's trucker protests: What is going on?

Ottawa residents decry anti-vaccine trucker 'occupation'

Emergency in Ottawa over 'out of control' truckers' protest

"It is clear that this is not a protest; this is an act to try to overthrow the government, and it is getting funded by foreign interference and we need to investigate and stop that – stop the flow of that foreign interference, particularly coming from the [United] States," said Singh, whose party has the [fourth-most seats](#) in the House of Commons.

"We are calling for an emergency debate in parliament to respond to the convoy and to the escalating tensions that we're seeing," he added.



The convoy of Canadian truckers and their supporters began arriving in Ottawa on January 28 to denounce an order requiring truckers to be fully vaccinated against COVID-19 in order to cross Canada's land border with the United States.



The protesters are demanding an end to all coronavirus restrictions in Canada [Minas Panagiotakis/Getty Images/AFP]

The so-called “Freedom Convoy” was organised by known far-right figures who have espoused Islamophobic, anti-Semitic and other hateful views, the Canadian Anti-Hate Network non-profit group reported. Protesters marched through Ottawa on January 29, while several have pledged to stay in the city, home to about 1 million people, until all coronavirus restrictions are lifted in Canada.



cine mandates, vaccine passports and coronavirus-related fines, or “RESIGN their lawful positions of authority Immediately”.

Convoy participants have honked their horns incessantly for several days, blocked residential streets, set off fireworks late at night, harassed local residents, and generally disrupted daily life in the downtown core of the capital.

On Monday afternoon, an Ottawa judge granted a 10-day, interim injunction prohibiting convoy participants from honking their horns near downtown. The decision came in response to a proposed, class-action lawsuit filed on behalf of local residents. “Tooting a horn is not an expression of any great thought I’m aware of,” Justice Hugh McLean said as [reported](#) by CBC News.

Meanwhile, during the weekend, GoFundMe [announced](#) that it was taking down a fundraiser that had raised several million dollars for the convoy because it violated the company’s terms of service. It said it would refund all contributions. “We now have evidence from law enforcement that the previously peaceful demonstration has become an occupation, with police reports of violence and other unlawful activity,” GoFundMe said.

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Canada under former President Barack Obama, tweeted on Saturday.



But GoFundMe's decision drew condemnation from right-wing leaders in the US, including Florida Governor Ron DeSantis, who said the move to "commandeer \$9M in donations" was fraudulent and pledged to [launch an investigation](#).

Back in Ottawa, residents have [described](#) the ongoing protest as an "occupation" and Mayor Jim Watson declared a [state of emergency](#) on Sunday.

The move, Watson said in a statement, "reflects the serious danger and threat to the safety and security of residents posed by the ongoing demonstrations and highlights the need for support from other jurisdictions and levels of government".

The Ottawa Police Service (OPS), which at the start of the protest said its officers "have avoided ticketing and towing vehicle[s] so as not to instigate confrontations with demonstrators", has faced widespread criticism for its response to the convoy.

On Sunday, OPS [said](#) seven people had been arrested. 100 tickets were issued.

Some Ottawa convoy participants have waved Confederate and Nazi flags, spurring fear among residents [File: Patrick Doyle/Reuters]

The federal government has [promised](#) to provide support from the federal Royal Canadian Mounted Police (RCMP) to Ottawa police. On Monday afternoon, Marco Mendicino, Canada's minister of public safety, commended the OPS for "stepping up enforcement" actions, including handing out tickets and taking down structures.

"In the weeks that follow, we'll need to be really clear that we can't find ourselves in a similar situation again," Mendicino said during a news conference. "It would be a terrible precedent to say that if you show up to the nation's capital with heavy equipment and blockade the capital city, that you can force reckless change in our public policy."

But calls for Prime Minister Justin Trudeau to do more to stem the protest are growing.

"We need to see some leadership, and there hasn't been that leadership at the federal level," Singh of the NDP said on Monday morning. "We have a crisis on our hands, and we need to immediately have the prime minister – representing the federal level, the federal government – meet with the affected municipalities to offer any help that we can to solve this problem."

Other convoy protests were held in Vancouver, Quebec City and Toronto, Canada's largest city, on the weekend, but participants left at the end of those demonstrations. A vast majority of Canadian truckers – some 85 percent – are fully vaccinated against COVID-19, according to the Canadian Trucking Alliance (CTA), an industry advocacy group, which has condemned the convoy.



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Ongoing protest led by some far-right activists brings intimidation, violence and fear to Canada's capital, locals say.

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Canada's trucker protests: What is going on?

Prime Minister Justin Trudeau invokes emergency powers, but truckers vow to maintain protest until COVID curbs lifted.

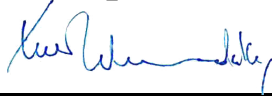
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OTTAWA

Ottawa police dealing with threats, fake calls tying up resources



Police Chief asks for 1,800 officers and civilians



Ottawa Police Chief: This is unsustainable



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Updated Feb. 7, 2022 5:27 p.m. EST

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Published Feb. 7, 2022 5:15 p.m. EST



Ottawa police say as they attempt to contain and eventually bring an end to the 11-day "Freedom Convoy" demonstration downtown, phony calls and threats are tying up their limited resources.

Police Chief Peter Sloly told Ottawa city council at a special meeting on Monday that the resources of the Ottawa Police Services are severely strained and he is requesting [1,800 additional personnel](#), including more 1,700 officers and 100 civilian personnel. Mayor Jim Watson and Ottawa Police Services Board chair Diane Deans sent letters to the federal and provincial governments requesting any additional police resources they can supply. The entire Ottawa Police Service is made up of 2,100 members, including 1,200 police officers.

But Sloly said some people are calling in false threats to tie up police resources further.

"We have people phoning in false messages, swatting messages to our police operations centre for active explosive IED events, gun events, that are drawing our resources away," Sloly said. "We now have an active investigation south of the border to identify that."

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Swatting is the act of calling police and lying that a major, life-threatening event is occurring at a particular location, in order to bring a significant number of resources to the area. Often, it is used as an attempt to frighten or intimidate people in the area identified and has had [deadly consequences](#).

Deputy Police Chief Steve Bell said there was also a threat made against Ottawa police headquarters Monday morning.

"A threat to the physical building at 474 Elgin today, that has resulted in co-operation with American authorities and ultimately ended with the arrest of a person who initiated those threats from Putnam County, Ohio," Bell said.

Bell did not identify the individual or say whether charges were laid, nor did he say whether the individual made the threat as a result of or in response to police actions surrounding the demonstration.

Police have faced criticism from residents for the length of the demonstration and an apparent lack of enforcement, allegations against which Sloly has repeatedly pushed back. Supporters of the convoy have criticized the police for enforcing the law, including with regard to Saturday's seizure of fuel and supplies in the parking lot of the baseball stadium on Coventry Road, which had become a staging area for protesters.

The Putnam County Sheriff's office told CTV News Ottawa by phone that a bomb threat was made, but they could not provide any additional information at this time.

The "Freedom Convoy" arrived in Ottawa on Jan. 28, which a much larger contingent arriving the next day. Since then, there have been hundreds of trucks left on the streets and hundreds of demonstrators who have refused to leave the downtown core. Trucks have been idled constantly and protesters have been honking their horns nearly

non-stop since the demonstration began, something Ottawa Mayor Jim Watson called "tantamount to psychological torture."

A 10-day injunction was granted by a judge to stop the honking, but it remains unclear how it will be enforced.

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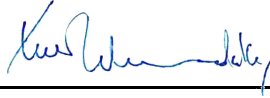
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A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

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Council condemns demonstration and asks for additional support

February 7, 2022

Council Updates

At today's special Council meeting, several motions were passed to deal with the ongoing demonstration in Ottawa. They included:

- Calling on both the Government of Ontario and the Government of Canada to provide all necessary financial and logistical supports required to bring the protest to a peaceful end and allow the City of Ottawa to return to normal.
- Condemning the racism, antisemitism and discrimination respectively experienced by the Black, Jewish, Muslim, racialized and members of the two-spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex (2SLGBTQI+) communities.
- Requiring staff to advise Council on the status of enforcement activities related to the demonstration, including number of vehicles towed, and numbers and nature of tickets issued.
- Removing vehicles illegally parked in residential areas and addressing ongoing impacts of continued by-law violations by these individuals.
- Petitioning the federal government to assume responsibility for public safety and security within the Parliamentary Precinct and to commit to an increased level of support of the Ottawa Police Service.
- Asking for an independent evaluation of the response to the demonstration.
- Requesting both the provincial and federal governments fund supports for Ottawa businesses, employees and community social support agencies impacted by the protest.
- Seeking increases to noise, idling, use and care of roads and open-air fire by-law set fines to \$1,000.
- Amending the existing idling by-law to allow idling in occupied vehicles only when the temperature outside is less than -15 C including the windchill within the protest area.
- Holding daily media availabilities for the duration of the truck convoy demonstrations.
- Seeking permission from the Province to recover demonstration-related policing costs from any persons deemed responsible for such costs.

Public Inquiries

311@ottawa.ca

311

<https://ottawa.ca>

Media Inquiries

medias@ottawa.ca

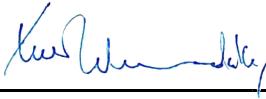
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Letter To PM Trudeau and Minister Mendicino RE Enforcement Resources Request - Feb 7 2022

Original Title: Letter to PM Trudeau and Minister Mendicino RE Enforcement Resources Request- Feb 7 2022

Uploaded by **CTV Ottawa**

A letter from the City of Ottawa to Prime Minister Justin Trudeau and Public Safety Minister Marco Mendicino, requesting additional police resources to bring an end to the "Freedom Convoy"
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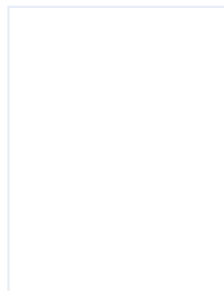




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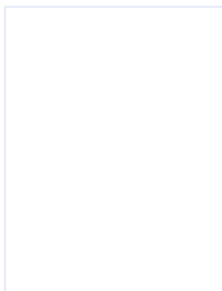
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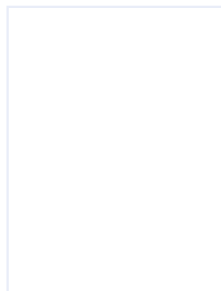
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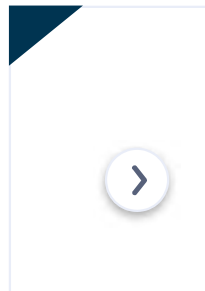
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Prime Minister and Minister Mendicino,

As you know, the City of Ottawa is facing unprecedented, unlawful demonstrations that are threatening the safety of the Ottawa community and our federal parliamentary institutions. The Ottawa Police Service has been doing everything in its power to bring this demonstration to a safe and peaceful end as quickly and safely as possible.

What was initially described as a peaceful protest has now turned into a siege of our downtown area. As of today, there are currently between 400 and 500 trucks occupying Ottawa's downtown core. The City's by-law officers have issued over 1000 tickets and remain vigilant in enforcement activities. Ottawa City Council is holding a special meeting to consider several motions to address this unprecedented situation.

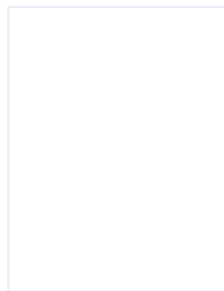
At first, this was labeled as a protest against the public health policies that democratically elected governments at the provincial and federal levels have enacted to protect us from the deadly COVID-19 pandemic.

But sadly, the demonstration has turned into an aggressive and hateful occupation of our neighbourhoods, which has nothing to do with the truckers' quarrel against vaccine mandates enacted by the Government of Canada, the Province of Ontario and municipal governments.

Let's not forget the words and symbols of hatred that we have witnessed throughout this occupation: Confederate flags, Nazi flags, racial and homophobic harassment towards our own residents – in a city that rightfully prides itself on being caring and compassionate.



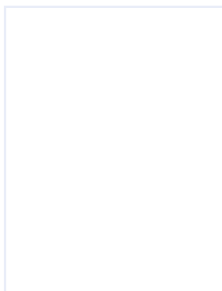
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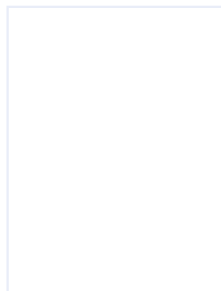
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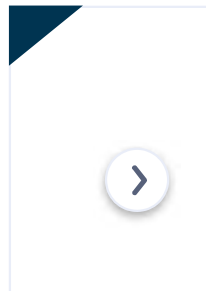
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officers, 100 investigative officers, 100 civilian staff, and all supporting resources. This includes, cyber investigative capacity, digital and social media forensics, and financial forensics.

We ask the Government of Canada and the Province of Ontario to work with us to secure this combined officer surge from the Government of Canada, the Province of Ontario and municipal police forces willing to participate from Ontario and other provinces.

We must do everything in our power to take back the streets of Ottawa, and our parliamentary precinct, from the criminal activity and hooliganism that has transpired over the last nine days

We need your help to end this siege in the heart of our nation's capital and in our residential neighbourhoods, and to regain control of our city.

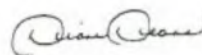
Our hope is that your department can help coordinate a response that matches the scale of the challenge we are facing.

We can contain the occupation, but we cannot end it without your support.

Sincerely,



Jim Watson
Mayor
City of Ottawa



Councillor Diane Deans
Chair
Ottawa Police Services Board



Jim Watson
Mayor Maire

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The Rt. Hon. Justin Trudeau
Prime Minister
Office of the Prime Minister
80 Wellington Street
Ottawa, ON K1A 0A2

February 7, 2022

The Hon. Marco Mendicino
Minister of Public Safety
269 Laurier Avenue, West
Ottawa, ON K1A 0P8

Prime Minister and Minister Mendicino,

As you know, the City of Ottawa is facing unprecedented, unlawful demonstrations that are threatening the safety of the Ottawa community and our federal parliamentary institutions. The Ottawa Police Service has been doing everything in its power to bring this demonstration to a safe and peaceful end as quickly and safely as possible.

What was initially described as a peaceful protest has now turned into a siege of our downtown area. As of today, there are currently between 400 and 500 trucks occupying Ottawa's downtown core. The City's by-law officers have issued over 1000 tickets and remain vigilant in enforcement activities. Ottawa City Council is holding a special meeting to consider several motions to address this unprecedented situation.

At first, this was labeled as a protest against the public health policies that democratically elected governments at the provincial and federal levels have enacted to protect us from the deadly COVID-19 pandemic.

But sadly, the demonstration has turned into an aggressive and hateful occupation of our neighbourhoods, which has nothing to do with the truckers' quarrel against vaccine mandates enacted by the Government of Canada, the Province of Ontario and municipal governments.

Let's not forget the words and symbols of hatred that we have witnessed throughout this occupation: Confederate flags, Nazi flags, racial and homophobic harassment towards our own residents – in a city that rightfully prides itself on being caring and compassionate.



These acts and the occupation are having damaging and long-term impacts on the well-being of our residents.

People are living in fear and are terrified – and they’ve now been subjected to the non-stop honking of large trucks for nine days, which is tantamount to psychological warfare.

Although we are grateful for and have started to welcome the additional officers on loan to the City from the RCMP, the OPP and other forces, we need a dramatic and immediate injection of additional officers.

Given the scope and scale of the armada of large trucks that are now occupying our downtown core, we are writing to you today to ask that you work to help the City secure 1800 officers to quell the insurrection that the Ottawa Police Service is not able to contain.

The following resources are required on an urgent basis: 1000 regular officers, 600 public order officers, 100 investigative officers, 100 civilian staff, and all supporting resources. This includes, cyber investigative capacity, digital and social media forensics, and financial forensics.

We ask the Government of Canada and the Province of Ontario to work with us to secure this combined officer surge from the Government of Canada, the Province of Ontario and municipal police forces willing to participate from Ontario and other provinces.

We must do everything in our power to take back the streets of Ottawa, and our parliamentary precinct, from the criminal activity and hooliganism that has transpired over the last nine days

We need your help to end this siege in the heart of our nation’s capital and in our residential neighbourhoods, and to regain control of our city.

Our hope is that your department can help coordinate a response that matches the scale of the challenge we are facing.

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Sincerely,

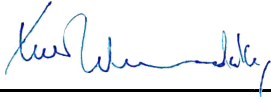
Jim Watson
Mayor
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Councillor Diane Deans
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Ottawa Police Services Board

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Government
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Joint Statement from Ministers Blair, LeBlanc, Fortier, Mendicino and Alghabra

From: Public Safety Canada

Statement

OTTAWA, February 7, 2022 - Today, the Honourable Bill Blair, President of the Queen's Privy Council for Canada and Minister of Emergency Preparedness, the Honourable Dominic LeBlanc, Minister of Intergovernmental Affairs, Infrastructure and Communities, the Honourable Mona Fortier, President of the Treasury Board, the Honourable Marco Mendicino, Minister of Public Safety, the Honourable Omar Alghabra, Minister of Transport, issued the following statement on the situation in Ottawa:

"Over the past weekend, a number of demonstrations took place across the country. By and large, they were peaceful and lawful. This is thanks to local police who ensured the law was enforced rigorously and fairly, as well as residents and businesses who showed patience and understanding.

Yet the ongoing blockades in downtown Ottawa remain an alarming exception. Ottawans have had to endure significant disruption to their lives – to say nothing of vandalism, harassment and expressions of hate & violence. This is unacceptable. No matter how much a small minority may hold themselves above public health measures, they are not above the law.

Since the beginning, the federal government has been there to support the City of Ottawa and the Ottawa Police Service. This began with coordination and logistical support before the convoy arrived in Ottawa. Over the past 10 days, Ministers Mendicino, Blair, Alghabra, LeBlanc, Fortier and others have been in close contact with Mayor Watson, as well as an array of other municipal and provincial officials to hear directly about what they need and respond accordingly.

Minister Alghabra will also be meeting with his Ontario counterpart shortly, and will ask that they work with insurance companies to explore consequences for trucks parked illegally on the streets of Ottawa.

As in any Canadian city, the municipal government and local police are leading the management of the situation, with the federal and provincial governments supporting them and offering assistance as requested. While governments write laws, police enforce them and operational decisions are taken by the police, independent of the government.

To ensure continued close cooperation among all levels of government and formalize the discussions already taking place, we are convening a table with relevant federal and municipal

partners to further strengthen our response to this situation.

As the situation has unfolded, the RCMP has approved successive requests from the City and OPS for additional resources. Most importantly, this includes a request for more officers last Thursday and another one over the weekend. The RCMP has mobilized resources and in total, nearly 300 RCMP officers are under the command of the OPS – as well as tactical police troops, joint intelligence & operational teams and community liaison teams. The RCMP remains in close touch with OPS, and stands ready to provide further assistance.

Canadians have a right to feel safe in their communities. The pandemic and restrictions won't last forever – we've made it this far by sticking together, looking out for one another and doing what it takes to save lives. We know that vaccines are safe, effective and save lives. They're the best way to protect one another and most importantly, get out of the pandemic.

Canadians agree – that's why we're among the most vaccinated countries in the world.

The federal government will continue to do the work that Canadians elected us to do: protect their health and safety using science and evidence. We'll continue to support the City and OPS with whatever they need to resolve the current situation as soon as possible."

Contacts

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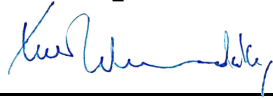
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Judge has 'heard enough,' grants interim injunction against truckers honking in Ottawa

Lawyer representing Ottawa residents in proposed multimillion-dollar class-action lawsuit argued the prolonged honking is causing irreparable harm



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Truckers occupation and protesting continues its 11th day in Ottawa on Monday. TONY CALDWELL, Postmedia.

OTTAWA — Ontario Superior Court Justice Hugh McLean has granted a 10-day injunction to prevent truckers parked on city streets in downtown Ottawa from honking their horns incessantly.

STORY CONTINUES BELOW

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McLean says the injunction is temporary because he needs to hear more evidence, but has heard enough to make this ruling as a protest against COVID-19 pandemic measures continues to paralyze the national capital around Parliament Hill.

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Keith Wilson, representing three of the respondents in the case, had told McLean the ruling on the injunction would carry national importance.

McLean said he heard enough evidence that the continual blaring of horns was having an effect on residents that their right for “quiet, if we can use that term,” trumped the honking truckers’ right to protest.

STORY CONTINUES BELOW

But McLean said the injunction was temporary because a “myriad of people” may still wish to come before the court to be heard.

The hearing adjourned and the court is slated to hear more evidence on how the injunction will be enforced.

Earlier Monday, Public Safety Minister Marco Mendicino said an “angry crowd” should not be allowed to dictate policies to fight COVID-19.

Protesters have “crossed the line of acceptable conduct” toward fellow Canadians in their bid to pressure the government, Mendicino said during a federal update on the ongoing events.

“We all want to see a return to normal life,” Mendicino said.

“And I assure you that day is coming soon.”

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“We believe in peace, order and good government in Canada,” he said. “Canadians deserve to feel safe in their communities and no one is above the law.”

Emergency Preparedness Minister Bill Blair, who also took part in the briefing, said it is not the role of any government to direct law-enforcement operations.

But he announced that a trilateral table of federal, provincial and municipal partners would help oversee the response.

There have been numerous calls for the federal government to manage the protest response. Ministers and MPs have taken a guarded approach so far, citing the imperative to keep politics separate from policing.

The news conference was held online instead of on Parliament Hill, the scene of what some have called an occupation or siege as big-rig trucks and other vehicles clog up the city core.

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Amid blaring truck horns, the demonstration has included open fires, makeshift feeding stations, encampments and numerous — sometimes profane — anti-government signs.

Some local politicians have called on Prime Minister Justin Trudeau to take a more active role in the situation. Trudeau's itinerary says he is having private meetings today somewhere in the National Capital Region.

Protesters and some MPs are urging Trudeau to meet the organizers. The prime minister took that off the table a week ago, saying he had no intention of meeting with a “fringe minority” that holds “unacceptable views.”

The so-called Freedom Convoy rolled into the national capital over a week ago and many in the hundreds of vehicles in the core have vowed to stay until all COVID-19 restrictions, including mask and vaccination mandates, are lifted.

STORY CONTINUES BELOW

City police say the situation has taxed their resources, and Ottawa's mayor has declared a state of emergency partially aimed at underlining the need for extra help from upper levels of government.

On Monday, Ottawa police Chief Peter Sloly asked the mayor to request 1,800 additional police and civilian personnel for immediate use until the end of the demonstration in the city.

That would nearly double the existing resources of the entire Ottawa Police Service, which has 2,100 police and civilian members.

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Ontario Premier Doug Ford said Sunday the province has given Ottawa everything the municipality has requested, and will continue to do so.

This report by The Canadian Press was first published Feb. 7, 2022.



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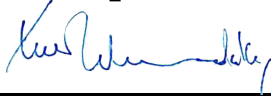
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Enforcement of Court Order in Downtown Core

Posted On Tuesday February 08, 2022

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FOR IMMEDIATE RELEASE: Tuesday, February 8, 2022 6:34pm

(Ottawa) – On February 7, 2022, Justice McLean of the Ontario Superior Court of Justice granted a temporary injunction restraining any person, who has notice of the court order, from using air horns or train horns, other than those on a motor vehicle of a municipal fire department.

This order applies to the downtown core in the City of Ottawa which is defined as any streets north of Highway 417 (Queensway). The injunction has been granted for a period of 10 days (i.e. until end of day February 17, 2022) and will be enforced by the Ottawa Police Service and its partners effective immediately.

If a person, with reasonable notice is believed to be

1. using air horns or train horns, other than those on a motor vehicle of a municipal fire department; and
2. is in the vicinity of downtown Ottawa: this geographical location includes the city's downtown, and specifically, any streets north of Highway 417 (Queensway), for a period of 10 days.

Then they may be arrested for contravening the Court Order or they may be arrested and/or charged under Section 127 of the *Criminal Code*.

If a person is arrested for contravening the Court Order and the person indicates, in writing, that they will obey and abide by the Court Order, they may be released.

If a person is arrested for contravening the Court Order and they refuse to indicate in writing that they will obey and abide by the Court Order, they may be taken to the Superior Court for civil contempt proceedings and criminal contempt prosecutions. Penalties include up to two years imprisonment and/or another form of punishment as deemed appropriate at time of conviction.

- 30 -

CONTACT:

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Court File No: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

THE HONOURABLE MR JUSTICE MCLEAN) MONDAY, THE 7th DAY
)
) OF FEBRUARY, 2022

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
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JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants/Responding Parties

ORDER

THIS MOTION, made by the Plaintiff for an interlocutory injunction and costs, pursuant to section 101 of the *Courts of Justice Act* and Rule 40.01 of the *Rules of Civil Procedure*, was heard at Ottawa on February 5 and 7, 2022 by videoconference.

UPON READING the motion records of the parties and **UPON HEARING** the oral arguments made by counsel for the parties by Zoom,

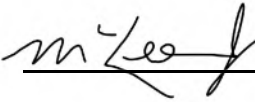
1. **THIS COURT ORDERS** that an interlocutory injunction is granted, pursuant to

section 101 of the *Courts of Justice Act*, Rule 40.01 of the *Rules of Civil Procedure*, and section 12 of the *Class Proceedings Act*.

2. **THIS COURT ORDERS** that any persons having notice of this Order are hereby restrained and enjoined from using air horns or train horns, other than those on a motor vehicle of a municipal fire department, in the geographic location anywhere in the City of Ottawa, in the vicinity of downtown Ottawa, being any streets north of Highway 417, otherwise known as the Queensway, for 10 days from the date of this Order.
3. **THIS COURT ORDERS** that the Defendants Barber, Dichter and Lich forthwith direct that they communicate this Order through their social media and other channels to all persons they know who are or who have been participating in the Freedom Convoy Protest in Ottawa, Ontario, from January 28, 2022, to the present day;
4. **THIS COURT ORDERS** that any police officer with the Ottawa Police Service, and/or the appropriate police authority in the jurisdiction in question (the "Police"), shall have authorization to arrest and remove any person who has knowledge of this Order and who the Police have reasonable and probable grounds to believe is contravening or has contravened any provision of this Order.
5. **THIS COURT ORDERS** that the Police shall retain discretion:
 - a. as to the timing and manner of enforcement of this Order, and specifically retain discretion as to the timing and manner of arrest and removal of any person pursuant to this Order; and
 - b. to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has contravened, any provisions of this Order, upon that person agreeing in writing to abide by this Order.
6. **THIS COURT ORDERS** that any peace officer and any member of the Police who arrests or arrests and removes any person pursuant to this Order shall have authorization to release that person from arrest upon that person agreeing in writing to obey this Order;
7. **THIS COURT ORDERS** that, provided the terms of this Order are complied with, the Defendants and other persons remain at liberty to engage in a peaceful, lawful and safe protest.
8. **NOTICE OF THIS ORDER** may be given by: posting copies of this Order in or around downtown Ottawa; reading the Order to any person, including but not limited to reading the Order over an amplification system publishing this Order

online, including on social media accounts associated with the Defendants, and by distributing copies of this Order to media including CBC, Radio-Canada, CTV, Global News and all daily newspapers in the Ottawa-Gatineau area.

9. **THIS ORDER** shall not apply to persons acting in the course of or in the exercise of a statutory duty, power or authority.
10. **THIS COURT ORDERS** that the costs of this motion shall be in the cause.
11. **THIS COURT ORDERS** that the parties shall appear before the Court in Ottawa by videoconference on February 16, 2022 at 10:00am for the hearing of a motion to continue this Order.

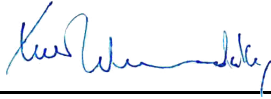


Date of Issuance: 02/07/2022

This is Exhibit “DDD” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits
Nur Muhammed-Ally, Counsel



OTTAWA POLICE SERVICE
SERVICE DE POLICE D'OTTAWA
A Trusted Partner in Community Safety
Un partenaire fiable de la sécurité communautaire

Ottawa Police Service Makes 23 Arrests in Relation to Demonstration – 1,300 Tickets Issued

Posted On Tuesday February 08, 2022

Like 288

Tweet



[Subscribe](#)

FOR IMMEDIATE RELEASE: Tuesday, February 8, 2022 4:15pm

(Ottawa) – The Ottawa Police Service and its partners are continuing to work to put an end to the unlawful demonstrations in the downtown core, respond to calls for service, and improve neighbourhood safety.

We continue to advise demonstrators not to enter Ottawa, and to go home.

As of 12:00 PM EST, the Ottawa Police Service can report:

Enforcement and Charges Laid

- Police have responded to over 850 calls for service in relation to the demonstrations since they began.
- Police continue to prevent people from supplying fuel and other material supports to demonstrators.
- There have been 23 arrests in relation to criminal charges. This includes charges for the following:
 - Mischief (Transportation of Gas)
 - Resist Police
 - Flight from Police
 - CDSA Possession Schedule I
 - Drive Disqualified
 - Breach of Probation
 - Menacing
 - By-law and Police Services have issued more than 1,300 tickets since the beginning of the occupation, including tickets for the following:
 - Excessive noise
 - Use of Fireworks
 - Failure to drive in marked lane
 - Red light violations

- Driving through a No Truck Route
 - Seatbelt violation
 - Driving a motor vehicle on a sidewalk
 - Cellphone
 - Disobey sign
 - Improper muffler
 - Tint (too dark)
 - Obstructed license plate
 - Failure to produce documents
 - Stunt Driving (vehicle seized)
 - Suspended licence
 - No Insurance
 - Parking Violations
- Several vehicles were seized and towed, including one stolen truck and an abandoned vehicle in a roadway.

Perimeter and Traffic Control

- As of yesterday, there were 100 demonstrators in the Wellington Corridor and 418 vehicles in the red zone.
- Kent St. remains blocked with traffic between Wellington and Somerset.
- Hundreds of concrete and heavy equipment barricades remain in place throughout Centretown, Lowertown, ByWard Market, Sandy Hill and the Glebe.

Intelligence and Investigations

- 85 criminal offence investigations ongoing in relation to the demonstration.
- Investigative Units estimate that approximately 25% of heavy vehicles are currently being used to house families with children. We are consulting with Children's Aid Society to ensure the safety of these children remains a top priority.
- An investigation is underway after an demonstrators refused to stop for Traffic Unit officer and hit a police cruiser near Bank and Flora at noon. No one was injured.
- The Ottawa Police Service is actively working with Canadian, U.S. and international security agencies authorities to investigate email-based threats to public officials.
- Worked with Ohio police authorities on menacing charges and an arrest in relation to swatting activity.
- As appropriate, images of potential suspects are being released to the public, including those in connection to an attempted arson in the downtown core.
- The Hate-motivated crime hotline has received over 200 calls, and Detectives are ensuring every report is investigated.
- Intelligence and evidence gathering teams continue to collect financial, digital, vehicle registration, driver identification, insurance status, and other related

evidence that will be used in criminal prosecutions.

Operations

- All available Ottawa Police Service officers remain on active duty, focusing on patrolling and addressing unlawful and threatening conduct in Centretown, Sandy Hill, Lowertown and the ByWard Market.
- A Public Order Unit was swarmed by demonstrators after officers came to the assistance of an officer seizing material meant to support demonstrators.
- Operations are ongoing to shut down demonstrator staging and supply sites, including those on Coventry Road.
- The Ottawa Police Service is working with policing partners and all levels of government to secure additional resources and further escalate enforcement operations.

We encourage all residents who have witnessed or been the victim of unlawful behaviour to please contact the Ottawa Police at 613-236-1222 ext. 7300, or ext. 5015 for hate-related crimes. Reports may also be submitted online at www.ottawapolice.ca.

The Ottawa Police Service will continue to provide updates as they become available.

- 30 -

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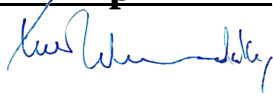
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Sworn before me this 4th day of

April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



Windsor Police Service News Update

Date: Wednesday, February 8, 2022

In the last 24 hours members of the Windsor Police Service have:

- Answered 344 calls to Emergency 9-1-1 phone lines
- Responded to 102 calls to 911 requiring police attendance
- Handled 337 calls for service (dispatched or officer-initiated)
- Issued 14 tickets for provincial offences (traffic and alcohol violations etc.)
- Arrested and lodged 9 prisoners in the WPS Detention Unit cells

UPDATE IN RELATION TO GATHERINGS AND DEMONSTRATIONS ON HURON CHURCH ROAD AT THE AMBASSADOR BRIDGE

On January 29, 2022, a Freedom Convoy involving those who identified as long-haul truck drivers arrived in Ottawa from across the country to protest vaccine-related border mandates imposed by the Federal Government. This mandate requires that truckers who cross the Canadian border in the United States to be vaccinated. The demonstrations have expanded to calls to end all COVID-19 vaccine mandates and gained traction, including more recently in Windsor, along Huron Church Road at the Ambassador Bridge.

The Windsor Police respects the rights of Canadians to exercise their freedom of expression and peacefully assembly. All members of the general public, road users, residents, businesses and international travelers also have the right to a safe environment. With that, we recognize the need to balance individual rights and freedoms with the need to maintain public peace and order. This is why our focus is on maintaining open communications with organizers of the demonstrations

and using a reasoned, tempered approach, including the appropriate use of police discretion to guide our police personnel's responses.

The Windsor Police Service has a large police presence monitoring the demonstrations along Huron Church Rd. These activities have interrupted normal vehicle traffic flow but we have been able to continue a limited amount of access to the Ambassador Bridge. Officers are on scene addressing traffic points, public safety and enforcement. Commercial vehicles are being redirected to the Blue Water Bridge in Sarnia. The Detroit-Windsor Tunnel remains open to non-commercial vehicles. Please avoid the area, use alternative routes and monitor our social media for updates.

The Windsor Police Service has maintained communications with main organizers but we want to urge those involved in illegal activity not to endanger members of the public or first responders, including police personnel, and jeopardize public peace. Those found committing crimes and acts of violence will be investigated and charges will be laid. This includes enforcement of traffic related offences and investigating any criminal acts. This also includes police personnel considering waiting for a lower-risk opportunity to arrest offenders rather than inflame a situation.

Chief Mizuno states "We understand the concerns of our citizens and we share those concerns. We want to reassure the public that we continue to actively engage with and monitor these demonstrations. We will maintain the peace and public/ traffic safety."

The Windsor Police Service would like to thank the public for their patience during this disruption.

For further information:

Contact the WPS Corporate Communication Unit's Public Information Officer by email at media@windsorpolice.ca

Content posted by:

Sergeant Andy Drouillard
Corporate Communications Unit
Windsor Police Service - Headquarters

Windsor, Ontario, Canada

Latest News

[February-28-2022-Update-1](#)

[February-25-2022-Update-1](#)

[February-24-2022-Update-1](#)

[February-23-2022-Update-1](#)

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Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

Ottawa

Large number of children among protesters hampering response, police say

Deputy Chief Steve Bell says almost 1/4 of trucks in protest include children

CBC News · Posted: Feb 08, 2022 1:13 PM ET | Last Updated: February 8



Children stand on top of a truck in front of Parliament Hill as a rally against COVID-19 restrictions continues into its 12th day. (Patrick Doyle/The Canadian Press)

The latest protest developments:

- ***Ottawa police working with Children's Aid Society around concerns for children in convoy.***
- ***Mayor says he had constructive discussions with Justin Trudeau and two ministers Tuesday afternoon.***
- ***Ottawa police have made 23 protest-related arrests.***
- ***RCMP say they're providing around-the-clock support to their municipal counterparts.***
- ***Ohio man facing possible charges for swatting calls to the wrong Ottawa.***
- ***Towing companies on city contracts [refusing to move convoy vehicles](#).***
- ***Some downtown Ottawa residents say they've [fled their homes](#).***

Ottawa police say almost 25 per cent of the 418 trucks still involved in the ongoing demonstration downtown have children in them, which has hampered the force's response and led to concerns about the children's safety.

Police provided an update Tuesday afternoon where Deputy Chief Steve Bell said officers have issued more tickets, made more arrests, and launched dozens more criminal investigations during what they call an "occupation" of the downtown core, now in its 12th day.

As of noon Tuesday, police say they have arrested 23 people and there are currently 85 active criminal investigations. They also released more details on their enforcement of the 10-day interim court injunction against honking horns, saying anyone arrested for contravening the court order who agrees, in writing, that they will abide by the order may be released, while those who refuse to do so may be taken to Ontario Superior Court to face both civil penalties and criminal prosecution.

Bell also turned his focus to the children of protesters. Over the weekend, [bouncy castles were set up](#) near Parliament Hill to help entertain the children who remain. Bell said police are working the Children's Aid Society of Ottawa regarding those children.

WATCH | Many trucks in Ottawa have children in them, police say:





Kids in trucks complicate response to Ottawa protest, police say

2 months ago | 1:56

A large number of children in trucks at the Ottawa protest is complicating the response and police say they're working with Children's Aid to ensure their safety. Meanwhile, political division over the protests grows on Parliament Hill. 1:56

"It's something that greatly concerns us," Bell said, as first responders are worried about the constant exposure to carbon monoxide, fumes, noise levels and the sanitation of the children.

"We'll rely on the Children's Aid Society to help provide and give us guidance around that. We just think it's an important factor that complicates and makes this an even more challenging operation."

In a statement to CBC, the society confirmed it is working with Ottawa police and said it has a duty to investigate allegations of abuse and whether a child may need protection.

Parents question police, Children's Aid assessment

Some protesters CBC spoke to disputed that children are at risk.

"Children are protected by their parents, OK? They're fine. This is a perfectly peaceful protest," said Jacob Verellen who travelled to Ottawa from the Chatham-Kent area in southwestern Ontario. He said part of the reason he was at the protest was because of his nephew.

"This is wrong that we're even suggesting taking children from their parents."

Cynthia Boutilier travelled to Ottawa from north of Kingston, Ont. with three of her six children last Friday. Even though they brought a trailer with a wood fireplace, she said friends have put them up in a hotel.

While she said the protest has been a great learning experience for her children, she hopes officials are looking out for children.

"We are out here for our children and our children's future," she said. "What concerns me more is what is happening to my children and what may happen to them in the future and that is the reason that we're going to keep them out here, because they're on the forefront. [They] are the future that we're fighting for."

People warm themselves with a log fire in a bucket on Metcalfe Street during a protest against COVID-19 restrictions continues into its second week, in Ottawa, on Saturday, Feb. 5, 2022. (Justin Tang/Canadian Press)

Joanie Pelchat, the Quebec organizer of the Freedom Convoy compared the situation to when families go camping in the summertime with their children.

In an interview with Radio-Canada, she also said there were hundreds of volunteers who support the convoy and had opened their homes to truck drivers and their families, as well as others, like herself, that leave their hotel rooms open for people to shower.

"It's a big challenge for fuel, even more so now, but we really make sure that our truck drivers aren't lacking anything, that their children aren't lacking anything in terms of food, their basic health needs."

Police facing logistical problems

Police have also run up against many protesters carrying jerry cans into the protest area filled with water, which creates problems for officers who need to stop and conduct searches for those that have fuel, Bell said.

"[This move] identifies a level of sophistication and a level of ability of this group to try and subvert police efforts. That's concerning to us," he said.

People carry fuel cans after police said they will target protest fuel supply during ongoing demonstrations in Ottawa. (Patrick Doyle/Reuters)

Bell said police were also looking into a stockpile of fuel located at the camp set up on Coventry Road and officers are trying "to disrupt and deter these people from remaining in our city."

There have also been active attempts to interfere with police's ability to remove the vehicles in the downtown core, he said. Some vehicles have wheels removed, or no more brake fluid. The city has also run into issues with some tow truck companies on city contract [refusing to remove vehicles](#) from the protest.

The city said Monday it was reviewing those companies' contracts and looking at possible actions against them, and Bell said police were also looking outside Ottawa to see whether other municipalities could provide support to remove the large trucks.

This is one protester who removed the wheels from a pickup truck in downtown Ottawa. (Patrick Doyle/The Canadian Press)

In a tweet Tuesday afternoon, Mayor Jim Watson said he had constructive discussions with Prime Minister Justin Trudeau, Public Safety Minister Marco Mendicino and Emergency Preparedness Minister Bill Blair about the "ongoing occupation" of the downtown core.

Meanwhile, Trudeau said he reiterated that the federal government will make sure Ottawa has needed resources.



Chief asks for more resources

Bell added one man from the United States was arrested Monday after calling in fake threats to Ottawa police "designed to deceive and distract" emergency resources.

Local [police worked with Ohio police](#) to trace and arrest this individual, he added.

On Monday, Chief Peter Sloly said he needed about 1,800 more personnel to "turn up the heat" and end the protest in the nation's capital.

Sloly told reporters [the new police strategy announced Friday](#) helped make this past weekend's protest smaller compared to the previous weekend. He said police are currently making incremental progress toward ending the demonstration, but more help would end it quicker.

Police began raiding protest camps over the weekend, [seizing fuel and making more arrests](#) linked to protest activity.

- [Police raid on Ottawa protest camp is strongest show of enforcement yet](#)

Ottawa Mayor Jim Watson said Monday that requests will go to both federal and provincial governments for more officers to help out.

City council made its own moves Monday as residents demand action. [Council wants to increase fines](#) to \$1,000 for various violations, including noise, blocking roads, open fires, and idling vehicles throughout the state of emergency — and do away with the rule that allows a vehicle to idle when it's cold outside.

With files from Joe Tunney and Radio-Canada's Frédéric Pepin

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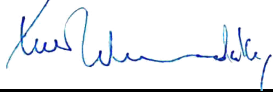
Visitez [Radio-Canada.ca](https://radio-canada.ca)

This is Exhibit “GGG” mentioned to
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Rebecca Coleman

Sworn before me this 4th day of

April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

The children of the 'Freedom Convoy': Kids with protesting parents complicate police response

By [Miriam Berger](#) and [Amanda Coletta](#)

February 17, 2022 at 5:40 p.m. EST



Listen to article 7 min



183

OTTAWA — They're a defining feature of the self-styled "Freedom Convoy": Children. And they're a major concern for Canadian authorities trying to end the weeks-long standoff that has paralyzed the capital.

Sandwiched between the big rigs blaring horns and blockading major thoroughfares are play pens and bouncy castles. Makeshift food stands serve kid-friendly meals. A sign in a tent at a logistics hub lists daily activities for adults — and kids.

All around are posters invoking the need to protect the children — a common refrain for anti-vaccine activists — alongside signs calling for an end to all public health mandates and for Prime Minister Justin Trudeau to be tried for various crimes, and worse.

Police have said roughly one-quarter of the protest vehicles here are occupied by families with children. Demonstrators say their presence underscores how peaceful their movement is.

But government officials and police say an illegal “siege” with car fumes and combustible fuel and that contains extremist elements is no place for kids — and vastly complicates their response to the crisis.

Police are prioritizing the “safest way to have children removed from the area prior to any sort of police action,” interim police chief Steve Bell said Thursday. He called the demonstrations “not a good place for children to be.”

Protesters have vowed to stay. Some have warned — some say threatened — authorities that if they try to intervene, children could get in their way.

The stakes rose this week when Trudeau invoked Canada’s Emergencies Act. The regulations bar bringing minors to unlawful demonstrations.

“The absolute safest way for this to end is for everyone to return to your communities,” Trudeau said last week. “It’s time to go home — especially if you have kids with you.”

As police officers handed out fliers this week warning protesters to disperse or face arrest, the Children’s Aid Society of Ottawa urged parents to make “alternate arrangements” in case they were “unable to care for their children following potential police action.”

None of this fazed Dany Beauregard, a 34-year-old arborist from Quebec who since Jan. 28 has been living in a heated, one-room trailer parked in front of Parliament with his wife, Jessica, a former trucker, their two toddlers and a tiny dog.

Shortly after police distributed their message, Beauregard headed out — to buy artificial grass for a makeshift front lawn. He was doing nothing illegal, he said, and had no reason to leave.

“It’s like camping, but in winter,” Beauregard said Tuesday. “I know I’m safe here. We are all like a big village.”

The challenges and consequences of how Canada handles these protests and the children within them are immense.

The urban blockade set up by civilians — some with far-right and extremist ties — encompasses large swaths of the downtown core. No one wants to be responsible for images of police violence and children, which could galvanize support for protesters and radical movements.

“It is a dangerous and volatile environment that they are in,” said Barbara Perry, a criminology professor at Ontario Tech University. “And it’s exploitative [by the convoy] of the kids to prey on the public’s sympathy.”

Since the convoy rolled up in late January, aided in part by foreign funding and fringe organizers who aren’t truckers, it has become a historic test of Canada’s democratic institutions. With copycats spreading from New Zealand to Europe — fueled by pandemic frustrations and anti-vaccine movements, in which children play a central symbolic role — what happens in Canada could also shape the broader fate of these protests.

“One cannot underestimate how the presence of children — more than the fear some protesters might be armed — has paralyzed any tactical police response” in Ottawa, Canadian journalist Glen McGregor tweeted. “I don’t know how they get the kids out without scalding images of their removal.”

Police, accused of taking too lax an approach to a protest that authorities have said is illegal, have cited the presence of children — and fears for their safety — as one reason they’ve been unable to resolve the crisis.

“We see children at protests all the time,” said Christian Leuprecht, a professor of political studies at the Royal Military College of Canada. “We don’t see children and youth at occupations, necessarily.”

Children have been most visible in Ottawa during the last three weekends, when thousands of protest supporters descended for a block party-like atmosphere — and, for many Ottawans, incessant noise, intimidation and harassment.

Hotels have filled with families. There’s a heated play tent for kids and near-constant music for dancing. Families opposed to face masks and vaccines mingle freely. Children draw supportive signs for truckers, who hang them in their windows.

“If you are heading up to Ottawa ... bring bouncy castles or bubble soccer bumpers, consider contributing to the fun!” a Facebook page associated with Freedom Convoy 2022, one of the organizing bodies, posted Thursday, as police warned action to clear the protests was “imminent.”

When the weekend protesters go home on Sundays, a more hardcore group of several hundred vehicles and demonstrators remains.

Authorities worry that the vehicle fumes, loud horns, extreme cold and highly combustible jerrycans of fuel pose serious dangers. The Children's Aid Society of Ottawa received "ongoing reports ... regarding child welfare concerns," police said last week.

A police spokesperson declined to say whether they were investigating related cases of child neglect. The Children's Aid Society of Ottawa did not reply to a request for comment.

Several local hospitals in Ottawa contacted by The Washington Post said they had not received cases of children sick from prolonged exposure to cold or fumes over the last several weeks.

Some families come just for a few hours — Emergencies Act or no. On Wednesday, several parents walking with their kids along the main blockaded thoroughfare told The Post they came for the day to show their children this history unfolding. They declined to give their names.

Convoy organizers have warned police against intervening.

"We have countless vulnerable people in our crowd, including children, the elderly, and the disabled, who cannot be met with force by a genuine liberal democracy," Tamara Lich, a key convoy organizer, said at a news conference Monday. She vowed to "hold the line."

For Leuprecht, from the Royal Military College, that amounts to using children as human shields.

“It is clearly an effort to instrumentalize children for the purposes of political protest and to hamper police enforcement of the occupation,” he said. He likened it to anti-vaccine protests in Germany, where kids were put on the front lines. “It’s not by accident that so many people did bring their children.”

Stephanie Carvin, an associate professor of international relations at Carleton University in Ottawa, said she had “never seen anything like” the level of children at these protests. But she believes the police have options.

“There are so many other things” police can do, such as focusing on people providing protesters food, showers and other resources, she said. “I don’t think it’s you go in regardless, or you can’t do anything because there are children there.”

Beauregard said Tuesday that his kids are safe, and he is not making plans to evacuate them.

Beauregard is not vaccinated against the coronavirus and his children, aged 3 and 11 months, have not had childhood immunizations. Beauregard said they’re here “to end the mandates” around public health.

Inside their RV, they have a big bed, a bunk bed, a table, kitchenette and toilet. They shower and do laundry at an Airbnb his in-laws rented nearby. Food and propane come via donations. They’ve written the address “3 Wellington Street” alongside their family name on their door.

“If the cops were to come here and say, well you have to leave cause ...” Beauregard said, his voice trailing off. He continued, cutting off the train of thought.

“Well, I don’t know why they want us to leave, as we can provide everything our children need,” he said.

By Miriam Berger

Miriam Berger is a staff writer reporting on foreign news for The Washington Post from Washington, D.C. Before joining The Post in 2019 she was based in Jerusalem and Cairo and freelance reported around the Middle East, as well as parts of Africa and Central Asia.

 Twitter

By Amanda Coletta

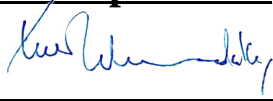
Amanda Coletta is a reporter based in Toronto who covers Canada for The Washington Post. She previously worked in London, first at the Economist and then the Wall Street Journal.

 Twitter

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Rebecca Coleman

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COVID-19 protests threaten border trade between Canada, US

Canadian lawmakers are expressing increasing worry about the economic effects of disruptive demonstrations

By **ROB GILLIES** and **TRACEY LINDEMAN** Associated Press

8 February 2022, 20:49 • 6 min read



Trudeau addresses protest

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The Associated Press

OTTAWA, Ontario -- Canadian lawmakers expressed increasing worry Tuesday about the economic effects of disruptive demonstrations after the busiest border crossing between the U.S. and Canada became partially blocked by truckers protesting vaccine mandates and other COVID-19 restrictions.

The blockade at the Ambassador Bridge between Detroit and Windsor, Ontario, prevented traffic from entering Canada while some U.S.-bound traffic was still moving, Public Safety Minister Marco Mendicino said, calling the bridge "one of the most important border crossings in the world." It carries 25% of all trade between Canada and the United States.

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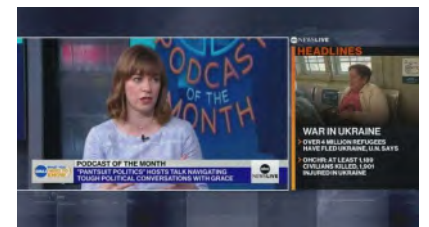


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Mar 31, 6:02 AM



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Canadian Transport Minister Omar Alghabra said such blockades will have serious implications on the economy and supply chains. "I've already heard from automakers and food grocers. This is really a serious cause for concern," he said in Ottawa, the capital.

Added Mendicino: "Most Canadians understand there is a difference between being tired and fatigued with the pandemic and crossing into some other universe."

Speaking in an emergency debate late Monday in Parliament, Prime Minister Justin Trudeau said the protesters are "trying to blockade our economy, our democracy."

Auto parts and other goods were still flowing across the border Tuesday evening, despite the bridge delays. But trucks had to travel almost 70 miles north to the Blue Water Bridge connecting Sarnia, Ontario, to Port Huron, Michigan. Authorities at that bridge reported a nearly three-hour delay for trucks to cross. In total, the trip will take more than five hours longer than normal.

Flavio Volpe, president of the Canadian Auto Parts Manufacturers Association, said the protesters have no right to park vehicles in the middle of roads. He questioned how many of the protesters were truckers because trucker associations and large logistics companies have disavowed the blockades.

"It is really a collection of kind of anti-government provocateurs," he said.

The protests also threaten supplies of fresh produce, livestock and other food, Volpe said.

Even a five-hour delay can cause production disruptions because factories are running so lean on part supplies with an already fragile supply chain, said Jeff Schuster, president of the LMC Automotive consulting firm in Troy, Michigan.

"Everything is so 'just-in-time' these days," he said. "We're still dealing with parts shortages in general and supply chain issues. This is just another wrench in the industry that we're dealing with right now."

Protesters also closed another important U.S.-Canada border crossing in Coutts, Alberta.

The daily demonstrations staged by the so-called Freedom Truck Convoy are centered in Ottawa, where demonstrators have used hundreds of parked trucks to paralyze parts of the capital for more than 10 days. Protesters have said they will not leave until all vaccine mandates and COVID-19 restrictions are lifted.

Protest organizers have been calling for weeks for the removal of Trudeau's government, although most of the restrictive measures were put in place by

provincial governments.

On Tuesday, the organizers withdrew an unlawful demand that the nation's governor general, the representative of Britain's Queen Elizabeth II as head of state, force federal and provincial governments to lift all COVID-19 restrictions, including vaccine mandates. They now say they support Canada's constitution and the democratic process.

François Laporte, the president of Teamsters Canada, which represents over 55,000 drivers, including 15,000 long-haul truckers, said the protests do not represent the industry in which 90% of drivers are vaccinated.

The Freedom Convoy "and the despicable display of hate led by the political Right and shamefully encouraged by elected conservative politicians does not reflect the values of Teamsters Canada, nor the vast majority of our members," Laporte said in a statement.

Canada's largest trucking company is virtually untouched by the vaccine mandate for truckers crossing the U.S.-Canada border, said Alain Bédard, chairman and CEO of TFI International Inc.

"Vaccination at TFI is not an issue at all," he said. The company's few unvaccinated drivers are kept in Canada.

The protests have also infuriated people who live around downtown Ottawa, including neighborhoods near Parliament Hill, the seat of the federal government.

Dave Weatherall, a federal civil servant, lives near the truckers' prime staging area in a city-owned parking lot outside of the downtown core. "They're using the lot to terrorize people," he said.

"It's the first time since having kids that I've seriously wondered about the world we brought them into. I always figured they could handle most things the world will throw at them, but this feels different," he added.

Ottawa's city manager said all tow-truck companies on contract with the city have refused to haul away the big rigs.

Joel Lightbound, a lawmaker for Trudeau's Liberal Party, rebuked his leader Tuesday for dividing Canadians and said his government needs to create a road map for when coronavirus measures should be lifted.

"It is time we stopped dividing people, to stop pitting one part of the population against each other," Lightbound said.

Trudeau said everyone is tired of COVID-19, and that the restrictions will not last forever. He noted that Canada has one of the highest vaccination rates in the world.

"This government has been focused every step of the way on following the best science, the best public health advice, to keep as many people as safe as possible. Frankly, it's worked," Trudeau said Tuesday.

Pandemic restrictions have been far stricter in Canada than in the U.S., but Canadians have largely supported the measures. Canada's death rate is one third that of its neighbor.

Meanwhile, the Canadian provinces of Saskatchewan, Quebec, Alberta and Prince Edward Island announced plans to lift some or all COVID-19 restrictions, with Alberta removing its vaccine passport almost immediately. A week ago, Alberta's premier said the vaccine passport could be eliminated by the end of March.

Quebec's plan doesn't include an end to mask mandates or the vaccine passport system.

Quebec Premier Francois Legault said the demonstrators who descended on Quebec City last weekend calling for an end to health measures didn't weigh on the government's decision to offer Quebecers a reopening plan.

"Now, if they (demonstrators) want to take credit for this, and then they don't come back in two weeks, I won't object to that," Legault said.

Gillies reported from Toronto. Associated Press Writer Tom Krisher in Detroit also contributed to this report.

 Comments (317)



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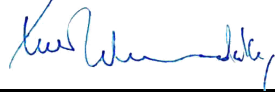
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A handwritten signature in blue ink, appearing to read "Nur Muhammed-Ally", is written over a horizontal line.

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Ottawa

Tow truck operator under attack after removing illegal shack at protesters' request

Driver supporting protests 'floored' by harassment, death threats

[Nicole Williams](#) · CBC News · Posted: Feb 08, 2022 4:00 AM ET | Last Updated: February 8



A plywood shack, used to provide meals to protesters, was removed from Confederation Park over the weekend at the request of organizers. The tow truck driver says he has received hundreds of phone calls and death threats as a result. (Joseph Tunney/CBC)

An Ottawa tow truck operator says he has received hundreds of calls, including death threats, from protest supporters who mistakenly believe he

removed a plywood shack from Confederation Park at the request of police, when he was actually helping protesters.

Structures in the park, including a shack used to provide meals for protesters, were removed on Sunday after protesters co-operated with police and the park was fenced off — a move lauded as a victory by the Ottawa Police Service.

"No encampment in Confederation Park. It is gone. We have fenced in that area and reclaimed that territory," said Chief Peter Sloly Monday.

Randy May says he was behind the wheel of the tow truck that relocated the shed to the lot on Coventry Road next to the Ottawa baseball stadium, which is a key camp for protesters.

The owner of Advanced Towing & Recovery, who says he supports the protest against all COVID-19 vaccine mandates and public health restrictions, said he was not contacted by police. He was actually contacted by one of the protest organizers, [Pat King](#), to remove the shack after responding to a plea on social media.

- [**Police raid on Ottawa protest camp is strongest show of enforcement yet**](#)
- [**Ottawa police boost enforcement, target protest's fuel supply**](#)

"We thought, 'Why not?' We own a company. We can help. We're all with the truckers and we support them 100 per cent," said May.

He and his son moved the shack for free, he says, which meant seven hours of unpaid labour. They received a police escort along the way.

"That's when I started getting all the hate. You know, the phone calls, the texts," said May. "We're talking hundreds of them."





As the sun set on Sunday, Feb. 6, 2022, Randy May towed this shack from Confederation Park to a lot on Coventry Road at the request of protest organizers, but with a police escort. (Joseph Tunney/CBC)

No help from organizers

Pictures of May's phone number, branded on the side of his towing vehicle along with the name of his company, were posted to various websites, he says, as many believed he removed the shed on police orders.

May gauges he has received calls from people across Canada and the U.S. who support the protest, which include harassment that sometimes escalate to death threats against him, his business and his family.

"It's been really, really nasty stuff, the phone calls and I can't get a word in edgewise," said May, who has tried to reason with people reaching out to him.

- [**Court grants injunction to silence honking in downtown Ottawa for 10 days**](#)
- [**Police, fire officials monitoring protest camp for 'public safety concerns'**](#)

"I'm floored. I'm a patriotic guy. I mean, I love Canada. We love the Americans. We all stand together, but stuff like this, it's disheartening."

May has since tried to contact protest organizers to clear up the misunderstanding so the calls stop. He says he has not yet received a response.

"It kind of swayed my judgment on certain things," said May, who does say he still supports the protest.

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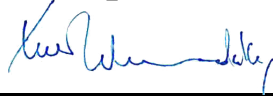
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Child and youth safety at Ottawa demonstrations

Posted On Wednesday February 09, 2022

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FOR IMMEDIATE RELEASE: Wednesday, February 9, 2022 12:45pm

(Ottawa) – The Ottawa Police Service (OPS), in collaboration with The Children’s Aid Society of Ottawa (CASO), will work to ensure the safety and wellbeing of children and youth at the current demonstration in the downtown core.

Ottawa police officers are aware of concerns about child and youth attendance at the demonstration.

Police have a role to play in observing any potential dangers and will report them immediately to CASO. In matters that involve a child or youth who is in the protest area, CASO will work closely with the OPS to respond to the concern. Child and youth wellbeing and safety is top of mind for CASO.

CASO continues to play its role in ensuring the safety and wellbeing of children and youth in the community. The Society has a duty to investigate whenever there are allegations of abuse or neglect that suggest a child or youth may be in need of protection.

There have been ongoing reports to CASO regarding child welfare concerns amid the Ottawa protest. CASO considers all information received from the public to determine the best response.

If there are concerns about the safety or maltreatment of a child or youth in Ottawa, please call CASO at 613-747-7800, or email yourcasquestion@casott.on.ca.

- 30 -

CONTACT:

Media Relations Section, Ottawa Police

Tel: 613-236-1222, ext. 5366

The Children's Aid Society of Ottawa

Media inquiries e-mail: yourcasquestion@casott.on.ca

Tel: 343-999-6616

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Ottawa Police Service

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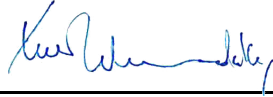
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News & Events

Canadian, US Business Associations Call for Immediate Action to Open Ambassador Bridge

Posted on: February 9th, 2022 by [cusbuser](#)

(OTTAWA) – February 8, 2022 – The below listed business associations issued the following statement regarding the closing of the Ambassador Bridge today amid protesting blockades.

“Business associations on both sides of the border are calling for a swift and immediate clearing of the Windsor-Detroit Ambassador Bridge blockade and a timely re-opening of the bridge. The group also urges the federal, provincial, state, and local governments to work collaboratively to deliver rapid solutions to the illegal blockages of traffic, which now include the Ambassador Bridge and the crossing between Coutts, Alberta and Sweet Grass, Montana.

The Ambassador Bridge is the busiest trade crossing in North America and a vital enabler of our two economies. Given the importance of ensuring that the supply of food, medical products and industrial goods can continue, the disruption at the Ambassador Bridge is an attack on the well-being of our citizens and the businesses that employ them.

As our economies emerge from the impacts of the pandemic, we cannot allow any group to undermine the cross-border trade that supports families on both sides of the border.

We stand ready to provide whatever assistance may be required to expedite a speedy re-opening of the Ambassador Bridge.”

Useful Links

[Canadian Trade Commission](#)
[US Commercial Service](#)

1000 Islands Gananoque Chamber of Commerce
Ajax-Pickering Board of Trade
Amherstburg Chamber of Commerce
Association québécoise de l'industrie du cannabis
Beer Canada
Burlington Chamber of Commerce
Canada – U.S. Business Association

Canada's Accredited Zoos and Aquariums
Canadian Agri-Food Trade Alliance
Canadian Airports Council
Canadian American Border Trade Alliance
Canadian Association of Importers and Exporters
Canadian Automobile Dealers Association
Canadian Chamber of Commerce
Canadian Federation of Independent Grocers
Canadian Food Exporters Association
Canadian International Freight Forwarders Association
Canadian Meat Council
Canadian Produce Marketing Association
Canadian Rental Association
Canadian Society of Customs Brokers
Canadian Steel Producers Association
Canadian Toy Association
Chatham-Kent Chamber of Commerce
Chemistry Industry Association of Canada
CropLife Canada
Detroit Regional Chamber
Electro Federation Canada
Federally Regulated Employers – Transportation and Communications
Food, Health & Consumer Products of Canada
Forest Products Association of Canada
Freight Management Association of Canada
Global Automakers of Canada
Greater Niagara Chamber of Commerce

Greater Oshawa Chamber of Commerce
Greater Sudbury Chamber of Commerce
Guelph Chamber of Commerce
Halton Hills Chamber of Commerce
Hamilton Chamber Of Commerce
Hearth, Patio & Barbecue Association of Canada
Heating, Refrigeration and Air Conditioning Institute of Canada
Institute of Canadian Agencies
Leamington District Chamber of Commerce
Lincoln Chamber of Commerce
Lindsay + District Chamber of Commerce
London Chamber of Commerce
Medtech Canada
Milton Chamber of Commerce
Mississauga Board of Trade
Niagara-on-the-Lake Chamber of Commerce

North American Strategy for Competitiveness, Inc.
Ontario Chamber of Commerce
Ottawa Board of Trade
Port Colborne-Wainfleet Chamber of Commerce
Quinte West Chamber of Commerce
Retail Council of Canada
Sault Ste. Marie Chamber of Commerce
Simcoe and District Chamber of Commerce
St. Thomas & District Chamber of Commerce
The Barrie Chamber of Commerce
The Brampton Board of Trade
The Chamber of Commerce Niagara Falls, Canada

The Greater Fort Erie Chamber of Commerce
Toronto Region Board of Trade
Wasaga Beach Chamber of Commerce
Welland/Pelham Chamber of Commerce
West Nipissing Chamber of Commerce
The Whitchurch-Stouffville Chamber of Commerce
Windsor-Essex Regional Chamber of Commerce
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Woodstock District Chamber of Commerce

For a printable version of the statement, click [here](#).

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CANADA

Windsor officials requesting assistance as Ambassador Bridge blockade continues

By **Ryan Rocca** • Global News

Posted February 9, 2022 11:17 am ▼

WATCH ABOVE: The city of Windsor is asking for federal and provincial aid to deal with a protest that has stopped incoming truck shipments across the Ambassador Bridge. Seán O'Shea reports. – Feb 9, 2022

**-A A+**

Officials in the City of Windsor say they will be requesting assistance from the provincial and federal governments as a protest against COVID-19 measures continues to block Canada-bound traffic on the [Ambassador Bridge](#).

Windsor Mayor Drew Dilkens and Chief of Police Pam Mizuno held a press conference Wednesday updating the response to the demonstration that has

entered its third day.

“As you are aware, over the past 48 hours the Ambassador Bridge has been impacted by protesters in a manner very similar to what has transpired on Parliament Hill,” Dilkens said.

READ MORE: [Windsor-Detroit Ambassador Bridge access resumes after trucker protest blocked traffic](#)

“The difference here, however, is the significant impact on the busiest national border crossing in North America and of course locally on our own economy in Windsor-Essex.”

STORY CONTINUES BELOW ADVERTISEMENT

Dilkens said he has spoken to provincial and federal officials over the past 24 hours and are “formally requesting additional resources,” though didn’t provide specifics as to what exactly is being requested.

“While we are hopeful this situation can be resolved in the near-term, we need to plan for a protracted protest and have requested additional personnel to be deployed to Windsor to support our hard-working members of the police service,” Dilkens said.

He said his office has received numerous complaints and calls from residents and businesses requesting that the protesters be “forcibly removed.”

2:44

Protesters opposing COVID mandates block crucial Ca...**Protesters opposing COVID mandates block crucial Canada-U.S. trade route****Ambassador Bridge Closed to Canada-bound trucks**

“While it may be gratifying for some to see the forced removal of the demonstrators, such action may inflame the situation and certainly cause more folks to come here and add to the protest and we don’t want to risk additional conflict,” he said.

STORY CONTINUES BELOW ADVERTISEMENT

“It is important to remember that we cannot ask our police services to risk the safety of all involved.”

He said the focus right now is on de-escalation and maintaining security.

Mizuno told reporters that there are approximately 50 to 70 vehicles involved in the demonstration and around 100 protesters.

She said officers are taking a “diplomatic approach” and trying to negotiate a resolution.

She added that discussions are what led to the opening of the northbound lanes of the bridge.

0:34
Same people selling ‘fake stories about empty shelves’...

Same people selling ‘fake stories about empty shelves’ causing shortages amid blockades: Alghabra	Not up to the federal government to ask for injunction amid Windsor, Ont. blockade: Mendocino	Protesters conti major border cr Ontario & Alber
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“Today, I will be forwarding a request to both provincial and federal officials looking to attain shared resources as we need them, in the form of personnel and equipment. We rely on all levels of government to assist in resolving these protests peacefully,” Mizuno said.

STORY CONTINUES BELOW ADVERTISEMENT

She said protesters are allowing emergency vehicles through as needed but warned that sudden road closures could impact emergency services.

Dilkins said that the protest is “holding hostage part of our national economy” and cannot be allowed to last long.

“In a democracy, everyone has the right to protest peacefully. It’s part of what makes Canada great,” he said.

“But the economic and social harm that these protests are having here in Windsor and Ottawa and across Canada is quite significant. The resolution to this will require a whole of government approach, with leadership required from Ottawa and Queen’s Park to bring down the temperature and resolve these protests peacefully.”

READ MORE: [Convoy protesters could be ‘arrested’ for blocking streets, Ottawa police warn](#)

Leo Lucio said he had spent the better part of the past three days at the protest in Windsor, which is happening not far from his home. He said recently returned from the protest in Ottawa, which caused that city’s mayor to declare a state of emergency.

TRENDING STORIES

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More Canadians may soon be eligible for another COVID-19 booster. Here’s what we know

“It’s a choke hold, that’s what I call it,” Lucio told The Canadian Press in a phone interview of the blockade at the Ambassador Bridge. “Cutting the head off the snake and the snake being (federal) Liberal party.”

STORY CONTINUES BELOW ADVERTISEMENT

Lucio said the protest isn't just about federal vaccine mandates for cross-border truckers. He would also like to see provincial pandemic restrictions gone and help for workers.

"It's the cost of living and everything else with it," he said. "It's a failure upon all levels of government."

Demonstration also leads to partial closure of highway near Sarnia, Ont.

Meanwhile, the Ontario Provincial Police said a part westbound Highway 402 in southern Ontario was closed Wednesday due to [convoy](#) demonstrations.

Police said the westbound lanes of the highway at Nauvoo Road were shut down due to "high traffic volumes" from "freedom convoy" demonstrators.

Drivers in the area are being asked to follow emergency detour route signage.

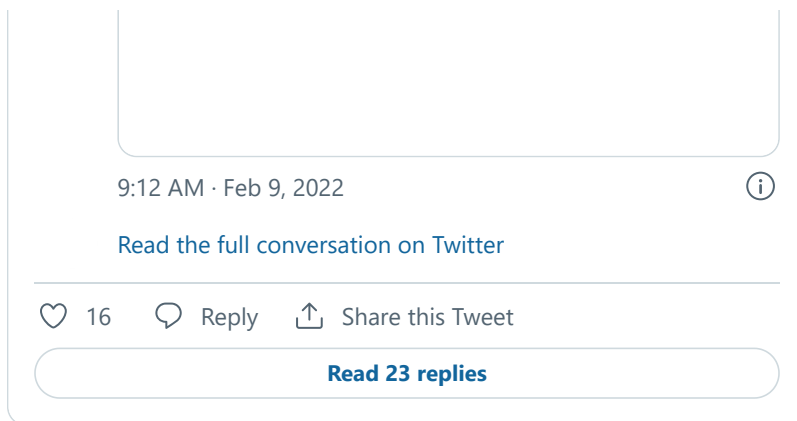
"The OPP respects the right of everyone to freedom of expression and peaceful assembly," police said.

"The OPP asks everyone to be patient and respectful of each other despite potential inconvenience."

OPP West Region
@OPP_WR



#LambtonOPP have implemented a closure of westbound Highway 402 at Nauvoo Road to ensure public safety. Please avoid the highway and follow EDR signage for planning your route. Monitor @511Ontario and local media for traffic updates. ^jb



STORY CONTINUES BELOW ADVERTISEMENT

The closure is approximately 45 km away from the Blue Water Bridge crossing between Canada and the United States in Sarnia, Ont. There, bridge itself remained open.

Part of Highway 402 [was blocked on Sunday](#) as well due to convoy demonstrations.

Police have redirected commercial traffic to the Bluewater Bridge in Sarnia, Ont., and urged motorists to avoid the area around the Ambassador Bridge in Windsor.

A large lineup of vehicles could be seen attempting to enter Canada via the Blue Water Bridge.

Provincial, federal officials react

Federal and provincial officials reacted to the blockade in Windsor Wednesday.

“We’re continuing to work with our provincial counterparts and the City of Windsor,” Prime Minister Justin Trudeau said.

“We need to stop the blockage of supply chains. Jobs are being affected.”

Emergency Preparedness Minister Bill Blair said the Ambassador Bridge is a “vital artery” to the country.

“I believe the rule of law has to be upheld. It is the responsibility of police to do that,” Blair said.

READ MORE: [Ambassador Bridge blockades will have ‘lasting effect’ on supply chain, experts say](#)

STORY CONTINUES BELOW ADVERTISEMENT

“We’ve seen many instances here of lawbreaking here and we will not direct the police, but we certainly have every expectation they will do their job.”

Premier Doug Ford released a statement which said that the “illegal occupation and blockade happening in Ontario must stop.”

“The Ambassador Bridge is one of the most vital trade corridors in our country,” Ford said.

“The damage this is causing to our economy, to people’s jobs and their livelihoods is totally unacceptable. We cannot let this continue.”

The premier said he has spoken with both the mayors of Windsor and Sarnia and added that the province is ready to provide any support it can offer.

“I remain confident that our police forces in Ontario, along with Royal Canadian Mounted Police and Canadian Border Services Agency, will take the appropriate steps to address the evolving situations in our cities and bring them to an end,” Ford said.

Ryan Rocca 



A screenshot of a tweet from the user @ryan_rocca. The tweet text reads: "NEW: Premier @fordnation issues statement on Ambassador Bridge blockade". Below the text is a large, empty rectangular box, likely a placeholder for an image or video. The tweet is displayed within a light blue border.

@ryan_rocca

NEW: Premier @fordnation issues statement on Ambassador Bridge blockade

STORY CONTINUES BELOW ADVERTISEMENT

One arrest made

In a tweet just after 8 p.m., Windsor Police said a man had been arrested in connection with the protests.



Officers said a man was arrested for allegedly “driving in a manner that is dangerous to public safety.”

“We urge everyone involved in the protest not to endanger members of the public or engage in illegal activities,” the tweet reads. “Public safety remains

our priority.”

— *With files from Amanda Connolly, Hannah Jackson and The Canadian Press*

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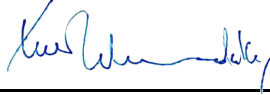
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Ottawa

Afternoon News with Mark Day and Danielle B

CityNews
Everywhere

Police confirm flood of calls came from truck convoy protesters, U.S.-based addresses

[Dani-Elle Dubé](#)

Feb 10, 2022 5:25 PM



Ottawa Police location on Elgin Street in November 2020. (Photo/Dani-Elle Dubé)

[Listen to this article](#)

00:00:57

When Ottawa police 911 call centre was flooded with calls, most of those numbers calling in were from the United States, Ottawa's police chief Peter Sloly confirmed.

In a media briefing on Thursday, February 10, Sloly said the calls — which almost jammed up the line on Wednesday night — were coming in by “elements supporting the core demonstrations in our country.”

Sloly said dispatchers are putting in contingencies to move those calls elsewhere as more come in — and have already come in when the protests started.

The swatting and doxing, he added, has been a regular occurrence and they’re almost often from U.S.-based addresses.

(Doxing is the act of publishing private or identifying information about an individual on the internet with malicious intent).

[Earlier](#) Thursday, police wanted to remind anyone who was calling to swat or dox police through the “concerted effort” that police are tracking the calls.

Anyone caught deliberately interfering with emergencies will be charged.

About the Author: Dani-Elle Dubé

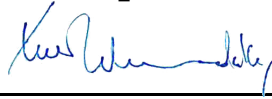
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Ottawa Police Service Works to Reduce Occupation Footprint -- 1,775 Tickets Issued

Posted On Thursday February 10, 2022

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FOR IMMEDIATE RELEASE: Thursday, February 10, 2022 3:15pm

(Ottawa) – The Ottawa Police Service and its partners are continuing to work to put an end to the unlawful demonstrations in the downtown core, respond to calls for service, and improve neighbourhood safety.

Yesterday, the Ottawa Police Service provided [a message to demonstrators](#) highlighting that it is a criminal offence to obstruct, interrupt or interfere with the lawful use, enjoyment or operation of property.

We continue to advise demonstrators not to enter Ottawa, and to go home.

As of 11:00 AM EST, the Ottawa Police Service can report:

Enforcement and Charges Laid

- Police have responded to nearly 1000 calls for service in relation to the demonstrations since they began.
- Police continue to prevent people from supplying fuel and other material supports to demonstrators.
- There have been 25 arrests in relation to criminal charges. This includes charges for the following:

- Public Mischief and Mischief
 - Resist Police
 - Flight from Police
 - CDSA Possession Schedule 1
 - Drive Disqualified
 - Breach of Probation
 - Menacing
 - Transportation of fuel
- Bylaw and Police Services have issued more than 1,550 tickets, including tickets for the following:
 - Excessive noise
 - Use of Fireworks
 - Failure to drive in marked lane
 - Red light violations
 - Driving through a No Truck Route
 - Seatbelt violation
 - Driving a motor vehicle on a sidewalk
 - Cellphone
 - Disobey sign
 - Improper muffler
 - Tint (too dark)
 - Obstructed license plate
 - Failure to produce documents
 - Stunt Driving (vehicle seized)
 - Suspended license
 - No Insurance
- Several vehicles were seized and towed, including one stolen truck and an abandoned vehicle in a roadway.
- On February 7, 2022, Justice McLean of the Ontario Superior Court of Justice granted a temporary injunction

restraining any person, who has notice of the court order, from using air horns or train horns, other than those on a motor vehicle of a municipal fire department in the vicinity of downtown. This order is being enforced by the Ottawa Police Service and its partners.

Perimeter and Traffic Control

- Officers negotiated the removal of 12 trucks at the Coventry Road encampment.
- Ten additional trucks departed from the Downtown Core.
- Kent St. remains blocked with traffic between Wellington and Somerset.
- Hundreds of concrete and heavy equipment barricades remain in place throughout Centretown, Lowertown, ByWard Market, Sandy Hill and the Glebe.

Intelligence and Investigations

- 126 active criminal offence investigations in relation to the demonstration.
- Investigative Units estimate that approximately 25% of heavy vehicles are currently being used to house families with children. We have consulted the Children's Aid Society to ensure the safety of these children remains a top priority (per the joint statement).
- An investigation is underway after an demonstrators refused to stop for Traffic Unit officer and hit a police cruiser near Bank and Flora at noon. No one was injured.
- The Ottawa Police Service is actively working with Canadian, U.S. and international security agencies authorities to investigate email-based threats to public officials.
- Worked with Ohio police authorities on menacing charges and an arrest in relation to swatting activity.
- The Hate-motivated crime hotline has received over 413 calls, and Detectives are ensuring every report is investigated.
- Intelligence and evidence gathering teams continue to collect financial, digital, vehicle registration, driver identification, insurance status, and other related evidence that will be used in criminal prosecutions.

Operations

- All available Ottawa Police Service officers remain on active duty, focusing on patrolling and addressing unlawful and threatening conduct in Centretown, Sandy Hill, Lowertown and the ByWard Market.
- Ottawa Police are not returning seized items associated to the demonstration, such as fuel.
- Operations are ongoing to shut down demonstrator staging and supply sites, including those on Coventry Road.
- The Ottawa Police Service is working with policing partners and all levels of government to secure additional resources and further escalate enforcement operations.

We encourage all residents who have witnessed or been the victim of unlawful behaviour to please contact the Ottawa Police at (613) 236-1222 ext 7300, or ext 5015 for hate related crimes. Reports may also be submitted online at www.ottawapolice.ca.

The Ottawa Police Service will continue to provide updates as they become available.

- 30 -

CONTACT:

Media Relations Section

Tel: 613-236-1222, ext. 5366

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Ottawa Police Service

P.O. Box 9634 Station T, Ottawa, Ontario, K1G 6H5

T: [613-236-1222](tel:613-236-1222), TTY: [613-232-1123](tel:613-232-1123)

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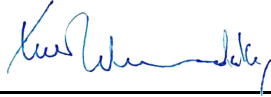
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Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits
Nur Muhammed-Ally, Counsel

February 10, 2022
Ottawa, Ontario

Today, Prime Minister Justin Trudeau convened the Incident Response Group on the ongoing illegal blockades taking place across the country that are threatening trade, jobs, the economy, and our communities. He was joined by ministers and senior officials who are actively engaged and working closely with provincial and municipal governments, and who are assessing the requirements and deploying all federal resources necessary to help them get the situation under control.

The Prime Minister, ministers, and officials emphasized their serious concern with the illegal blockades and occupations, and their determination to see them end quickly. The group discussed the significant federal support that the RCMP is providing to law enforcement partners both in Ontario and across Canada.

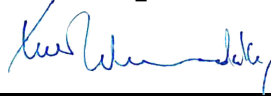
Ministers and officials updated the Prime Minister on their continued engagement efforts with their provincial and municipal counterparts. In particular, they discussed their effort to work with the Government of Ontario to restore access to the Ambassador Bridge and other ports of entry, which are vital trade corridors and where the illegal blockades are resulting in real harm to jobs and our economies on both sides of the border. Ministers and officials have also been in close contact with representatives and officials from the United States of America to align efforts to resolve this situation. The Prime Minister discussed his recent conversation with Premier Ford. The group committed to continue providing federal resources to support enforcement efforts in Ottawa where the occupation has significantly disrupted local residents' lives, impacting businesses and families with harassment, threats of violence, and vandalism. They reiterated that the federal government has and will continue to respond to all requests for appropriate support and resources.

The Prime Minister and ministers will continue to work closely with all orders of government and local authorities to respond with whatever it takes to help provinces and municipalities end the blockades and bring the situation under control. The government's top priority remains keeping people and communities safe, and defending jobs, trade, and our economy.

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Protest organizer: No intent to topple government ... and no plan to leave until COVID mandates lifted

The withdrawn Memorandum of Understanding 'was just meant for us to put exposure on the system'

Rachel Parent

Feb 10, 2022 • February 10, 2022 • 2 minute read • [197 Comments](#)



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The organizers removed their proposal from their website Wednesday, saying "We do not want any unintended interpretations to continue." PHOTO BY SPENCER PLATT / GETTY IMAGES

One of the organizers of Freedom Convoy 2022 says protesters aren't backing down from their demand to have all COVID-19 restrictions lifted across Canada, despite having withdrawn a controversial document that called for a committee of unelected figures to be established to meet that goal.

STORY CONTINUES BELOW



Since the protest started, one of the stated goals was getting a "memorandum of understanding" (MOU) signed by Canadian citizens. But on Tuesday, organizing group Canada Unity issued a statement to withdraw the MOU that demanded Gov. Gen. Mary Simon and the Senate join with the protesters to force federal and provincial governments to lift all COVID-19 restrictions, including vaccine mandates. The MOU was taken down from the Canada Unity website.

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desire with the MOU was to have a document where Canadians could peacefully express their displeasure with current (COVID-19) mandates, and express their desire to be free.”

STORY CONTINUES BELOW

The founder of Canada Unity, James Bauder, told the National Post that the MOU was never intended to be a legal document. It was just intended to create awareness about the mandates.

“We’re not lawyers,” said Bauder. “It was just meant for us to put exposure on the system against those three main mandates: the vax passport, the fines and the loss of our jobs. All three of those are the main focal point of the MOU.”

The group had been accused by some of using the document to try to legitimize an attempt to seize power from the federal government.

While organizers have repeatedly stated that they want protests to remain peaceful and are not interested in violence, Public Safety Minister Marco Mendicino said on Tuesday that Canadians would be troubled with anyone who associates themselves with “the extreme statements that have been made by the purported leaders of this convoy that would seek to incite the overthrow of the government through violence.”

STORY CONTINUES BELOW

The statement from Canada Unity said the group supports the constitution and the democratic process and are “committed to following lawful process and upholding freedom of choice.

“Canada Unity does not support or encourage any acts which tarnish democratic values held by Canadians.”

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“It wasn’t ever constrained to topple the government, ever,” he said. “The narrative has always been lawful, freedom of choice and lawful protesting. We have a right to be here we have a right to have our voices shared.”

Bauder said the protesters’ goal remains the same: to see all COVID-19 mandates lifted across Canada. Until then, there’s no plan to leave Ottawa.

“We are entertaining and working with anybody that can get Justin Trudeau to come sit with us,” he said.

National Post, with additional reporting from The Canadian Press



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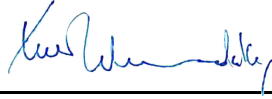
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Nur Muhammed-Ally, Counsel

Blockade continuing to block border in Emerson

📅 February 11, 2022
📍 Emerson, Manitoba

News release



[\(/sites/default/files/styles/cropped_large/public/news-nouvelles/2022-02-11/emerson_rcmp.jpg?itok=Gjf32vrh\)](https://www.rcmp-grc.gc.ca/en/news/2022/blockade-continuing-block-border-emerson)

Semi-trailers, farm implements, and passenger vehicles blocked the Canada/United States border at Emerson, Manitoba in the early morning hours of February 10, 2022. Officers from the Emerson and Morris RCMP detachments have been on scene since the arrival of the vehicles, and have received assistance from other RCMP detachments and units throughout the province.

The Manitoba RCMP immediately dispatched Divisional Liaison Officers to the scene, and they are working with the protestors to reach a peaceful resolution.

There are approximately 50 vehicles taking part in the blockade. That number has been fluctuating as vehicles leave and arrive.

Emergency vehicles, including police vehicles, as well as some agriculture transports have been getting through the blockade, but otherwise there is no traffic flow in the area. Police are advising motorists to expect substantial delays in the area and to avoid the Emerson area, if possible.

No tickets have been issued. No arrests have been made.

"We understand and appreciate the frustrations felt by everyone involved and everyone affected," said Chief Superintendent Rob Hill, Officer in Charge of Criminal Operations for the Manitoba RCMP. "The role of the RCMP is to ensure public safety and keep the peace while balancing the rights afforded to every Canadian under the Canadian Charter of Rights and Freedoms.

"The RCMP is on scene and will remain on scene until the situation at the border is resolved. We will continue to use discretion to guide our response to this evolving situation. Let me stress that proper use of police discretion should not be confused with lack of enforcement. We always need to assess the situation at ground level and that may require us to wait for a lower-risk opportunity to do enforcement rather than inflame the situation."

Officers are aware of a number of planned demonstrations throughout the province this weekend and are advising the public to expect delays due to convoys in the areas of Deacons Corner in the RM of Springfield, the Perimeter Highway around Winnipeg, Highway 3 in the Morden area, and the Selkirk area.

–30–

Contact information

Tara Seel, Media Relations Officer
RCMP Media Relations
204-983-8497

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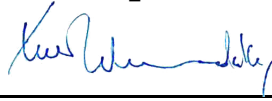
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Nur Muhammed-Ally, Counsel

February 11, 2022
Ottawa, Ontario

Today, Prime Minister Justin Trudeau spoke with the President of the United States of America, Joe Biden, to discuss the ongoing illegal blockades taking place across Canada, which are threatening trade, jobs, the economy, and communities on both sides of the border.

The two leaders discussed the critical importance of resolving access to the Ambassador Bridge and other ports of entry as quickly as possible, given their role as vital bilateral trade corridors and how essential they are to the extensive interconnections between our two countries – and our peoples.

The Prime Minister underlined the coordination taking place between all orders of government in Canada in responding to these challenges, as well as between relevant authorities in Canada and the United States. The leaders agreed to continue closely coordinating bilateral efforts to ensure our respective authorities have all of the tools and information required to bring these illegal actions to an end as quickly as possible.

The Prime Minister and President discussed the American and global influence on the protests, including financial support. The Prime Minister expressed concern that the flooding of Ottawa's 911 phone lines yesterday originated in the United States.

The two leaders agreed to stay in close touch.

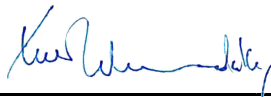
Associated links

- Canada-United States relations
(<https://www.international.gc.ca/country-pays/us-eu/relations.aspx?lang=eng>)
- Prime Minister Justin Trudeau convenes the Incident Response Group (<https://pm.gc.ca/en/news/readouts/2022/02/10/prime-minister-justin-trudeau-convenes-incident-response-group>)
- Roadmap for a Renewed U.S.-Canada Partnership
(<https://pm.gc.ca/en/news/statements/2021/02/23/roadmap-renewed-us-canada-partnership>)

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STATEMENT BY CANADA’S BUILDING TRADES UNIONS ON BLOCKADES

11 February 2022

Canada’s Building Trades Unions Executive Director, Sean Strickland, has released the following statement regarding the ongoing protests and blockades:

“Canada’s Building Trades Unions have always supported the freedom to peacefully protest and demonstrate however, the ongoing demonstrations we are seeing across Canada have gone too far, for too long.

From Ottawa to Windsor to Coutts – the protests are negatively affecting local residents, workers and our economy.

The protests in Ottawa have caused construction projects on Parliament Hill and in the downtown core to shut down because of lack of access to the sites, concern for worker safety and disruption in supply chain. This has caused hundreds of workers in the Building Trades unable to go to work, unable to earn a paycheck.

The blockade of the Ambassador Bridge between Windsor and Detroit is strongly affecting the automotive industry; plant shutdowns are imminent affecting thousands of auto workers and building trades contractors and members performing maintenance.

In Coutts, Alberta, the blockade is disrupting the agricultural and food supply chain causing job loss and hurting Canadian communities.

Canada’s Building Trades Unions stands firmly in denouncing the protests and call on the organizers to end the protest. With over 80 per cent of Canadians fully vaccinated, the mandates are winding down regardless. Let’s get back to work.”

-30-

Media Contact

Kate Walsh kwalsh@buildingtrades.ca 613.298.0652

About CBTU

Canada’s Building Trades Unions are an alliance of 14 international unions in the construction, maintenance and fabrication industries that collectively represent over 600,000 skilled trades workers in Canada. Each year, our unions and our signatory contractor partners invest over \$300 million in private sector money to fund and operate over 195 apprenticeship training and education facilities across Canada that produce the safest, most highly trained and productive skilled craft workers found anywhere in the world. Canada’s Building Trades Unions represent members who work in more than 60 different trades and occupations, and generate six per cent of Canada’s GDP. For more information, go to www.buildingtrades.ca

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Canadian Agriculture and Food Industry Calls for Government Action to Restore Essential Transport and Trade Corridors

February 11, 2022

Ottawa, ON - With the prolonged disruptions at Canada-U.S. border crossings, Canada's agriculture and food industry is calling for an immediate conclusion of the blockades and for all levels of government to work collaboratively towards action to reinstate integral transport and trade corridors.

Transport of fruits and vegetables, meat, food packaging, feed supplies, livestock shipments, transport equipment, and integral inputs for agriculture and food processing have already been seriously impacted by the blockades. These blockades are impacting the livelihoods of Canadian farm families, the further businesses they are connected to and the timely supply and delivery of essential goods.

Canada and the U.S. have the largest two-way trade of essential goods and each day the blockades continue further strains these integral supply chains and the Canadian economy. In 2020, Canada and the U.S. traded \$50 billion CDN dollars of agriculture and food for an average of \$137 million per day with Coutts, Alberta, Emerson, Manitoba, and the Ambassador bridge being key trade routes for these goods.

The signatories below are requesting immediate action by all parties to fully reopen Canada's trade corridors. This is imperative to the livelihoods of Canadian agriculture businesses and key to maintaining Canada's strong reputation as a stable trading nation.

Quotes:

"We cannot let these disruptions endanger Canada's reputation as a reliable and stable trading partner. Our sector's supply chains are highly integrated across the Canada-U.S. border and these vital trade corridors support jobs across Canada. It is time to restore stability in Canada's most significant and important trading relationship."

Dan Darling, President, Canadian Agri-Food Trade Alliance

"Maintaining a stable supply chain is critical to Canadian beef production. The evolving situation at the U.S.-Canada border and the transportation delays are resulting in major impacts for the entire beef supply chain and it is now time for this to end."

Bob Lowe, President, Canadian Cattlemen's Association

"Governments must recognize the negative impact these recent blockades and convoys are having on Canada's critical trade infrastructure, which includes the agriculture and agri-food sector, and take immediate actions to restore the supply chain."

Mary Robinson, President, Canadian Federation of Agriculture

“Canada’s fruit and vegetable growers have been faced with considerable supply chain disruptions throughout the past two years, and the recent border blockades have only exacerbated them. Now is the time for government to put an end to the blockades at our trading ports and ensure the uninterrupted movement of fruits and vegetables across the Canada-U.S. border.”

Jan VanderHout, President, Canadian Horticultural Council

“Pork industry’s supply chain operates on a structured, just in time delivery system for animal feed, movement of live animals across Canada and the U.S. and many more critical materials that keep our industry providing food for Canadians. Supply chain delays impact producers’ mental health and the potentially the health and welfare of the animals we are entrusted to care for. Our industry cannot sustain any more delays.”

Rick Bergmann, Chair, Canadian Pork Council

“These blockades are affecting the whole supply chain, from farm to fork. We need swift action to put an end to this. Throughout this period of disruption, our members have appreciated the agility and flexibility of the Canadian Food Inspection Agency to assist them in getting their products across the border and to market.”

Chris White, President, Canadian Meat Council

“Companies throughout the fresh fruit and vegetable supply chain continue to navigate the challenges and hardships of the pandemic. The recent blockades have compounded the strain on a fragile system that is working to address food inflation and availability. As trade between Canada and the United States relies heavily on open and fluid transportation corridors, it is essential all levels of government work together to address these issues and allow for the uninterrupted flow of perishable goods with our largest trading partner (the United States).”

Ron Lemaire, Canadian Produce Marketing Association

“The closures and delays caused by the protest blockades have affects all the way back to the farm gate. The beef supply chain has already been disrupted by drought, floods, transportation issues, and more; we need to get both products and animals moving freely across the border for the sake of animal welfare and economics alike.”

James Bekkering, Chair, National Cattle Feeders’ Association



Unifor condemns 'Freedom Convoy' actions



FEBRUARY 11, 2022

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Message to members:

Like so many of you, the National Union and its officers are monitoring the so-called 'Freedom Convoy' demonstrations taking place at Parliament Hill, at various border crossings and other locations throughout the country. The actions that convoy protestors have taken in recent weeks are troubling and, in some cases, reprehensible.

The past two years have taken a heavy toll on all of us. All workers in Canada, through daily acts of selflessness, bravery and solidarity, kept our economy moving. Through our collective efforts and sacrifices, we avoided the worst possible outcomes of this pandemic – despite tens of thousands of lives lost. Front-line workers continue to exemplify the best in all of us – they have not once let us down. No amount of thanks can ever demonstrate our gratitude for the burden they continue to carry.

This is what makes this protest so abhorrent.

In spite of these sacrifices, and in spite of the best, science-based guidance provided by public health officials, this group has taken the nation's capital, and critical border crossings, under siege. As a result, protestors are denying workers access to their jobs and economic security, including thousands of Unifor members. This disruption threatens the job security of members, many who are also facing layoffs due to microchip shortages and other supply chain challenges.

Let us be perfectly clear: Unifor firmly believes the right to protest is an essential part of our democracy. However, with every passing day, the actions associated with this movement pull away from that fundamental right. Reports that this campaign maintains close association to known right-wing extremists, condones hate symbols, conspiracy theories, and utilizes former military and police operatives all paint the picture of an insurgency – harkening back to the attack on the U.S. Capitol last year.

Unifor is urging all federal parties to condemn the 'Freedom Convoy,' through a joint statement. Further, Unifor is urging all levels of government to take immediate and reasonable steps to ensure the resumption of goods and people moving across borders. We expect governments to treat this escalating situation as a national emergency.

Further, and for too long, governments at all levels have ignored the threat posed by far-right organizations that seek to infiltrate legitimate workers' movements and advance messages of hate and division. They have allowed them to spread hateful messages, to raise funds and to act with impunity at great cost for workers, communities of colour, Indigenous people, members of the LGBTQ community, and many more.

We cannot and will not allow hate and division to shape the future of this country. We must organize against these groups and work together to advocate for a progressive Canada, one where everyone is included, where economic and racial justice are achieved.

We appreciate all of the letters of concern sent in from Unifor members, and your willingness to take counter-action. To ensure your safety, we are asking local union leadership not to engage directly with these protestors.

There are many ways to tackle hate. We can all do more in our communities and workplaces. Our union is actively building solidarity with established and effective anti-hate groups, and we encourage local unions to get in touch with us if you want to do more.

We continue to monitor the situation as it unfolds, and support our affected members in whatever way possible.

In solidarity,

Lana Payne, Renaud Gagné, Linda MacNeil, Naureen Rizvi, Gavin McGarrigle

February 11, 2022 12:10 pm



Amnesty International Canada Statement on “Freedom Convoy” Blockade

OTTAWA – Amnesty International has been following with great concern the developments relating to the “Freedom Convoy” blockade in Ottawa.

“Amnesty International Canada is deeply troubled by the reports of violence, harassment, intimidation, and hate speech which have surfaced since January 29th,” said Amnesty International Canada Secretary General Ketty Nivyabandi. “Nazi flags, Confederate flags, and other symbols of racism and hate exhibited have no room in peaceful protests. Equally concerning is the affiliation of some of the Convoy organizers with overtly racist, white supremacist groups.”

The failure of law enforcement agencies to respond swiftly and appropriately to reports of violence and harassment demands a prompt, thorough, and impartial public inquiry. The inquiry must also address instances of interference with residents’ rights to public health and social services delivery, as well as the harassment of healthcare workers,

reporters, people living with disabilities, and racialized and other marginalized persons.

“Authorities hold an equal international obligation to protect people from violence and harassment, and to respect the rights of all protesters to peaceful assembly and expression of their views. Violence and harassment however are not part of exercising the right to freedom of peaceful assembly. Amnesty International calls on authorities to take immediate and appropriate action to facilitate peaceful protests, while investigating and holding those perpetrating violence or inciting hate to account,” added Nivyabandi.

Throughout the demonstrations, racialized workers and residents have reported being singled out for abuse. Over **400 hate messages** are under investigation by the Ottawa Police. Frontline services have expressed **concern** about the impact of the ongoing demonstration on their ability to provide to already vulnerable clients. People with **disabilities** have reported disruptions and delays in receiving supportive care, given ongoing street blockages by demonstrators. Journalists experienced **threats and harassment**, both online and while reporting from the demonstration zone. Until a recent **court injunction**, residents were subjected to almost continuous high-decibel noise levels, including honking, air horns, train whistles, street parties and fireworks since the demonstration began at the end of January.

The Federation of Sovereign Indigenous Nations, Algonquins of Pikwakanagan, the Algonquin Anishinabeg Nation Tribal Council, and Kitigan Zibi Anishinabeg have also expressed concerns about the misuse and appropriation of sacred, traditional objects and ceremonies.

Further, Amnesty International Canada notes with great concern the permissive response afforded by the Ottawa Police to a largely white-dominant protest group. This response is in **sharp contrast** with how law enforcement authorities have mistreated **Indigenous and racialized protesters** in the past.

“Amnesty International Canada expresses solidarity with the frontline organizations, including homeless and women’s shelters whose operations have been impacted by these protests, as well as 2SLGBTQI+ and racialized communities – particularly Jewish, Muslim, Black and

Indigenous communities – who have been targeted by hate propaganda,” said Nivyabandi.

Further Background on Freedom of Peaceful Assembly

Peaceful protests are a fundamental part of a vibrant society. The right to freedom of peaceful assembly is a vital means of political engagement, with a long history of being a valid and effective means of bringing issues and grievances to light. Facilitating and protecting the right to freedom of assembly contributes to the protection of other human rights, including freedom of expression.

The right to hold assemblies and demonstrations on public roads has been consistently upheld by regional and international human rights bodies, which have established that urban space is not only an area for circulation but also a space for participation. The UN Special Rapporteur on Freedom of Peaceful Assembly and Association has affirmed that “the free flow of traffic should not automatically take precedence over freedom of peaceful assembly.” However, these rights are not unlimited. They can be restricted in order to protect the rights of others, public order and public health. The UN Human Rights Committee has said that “an assembly that remains peaceful but which nevertheless causes a high level of disruption, such as the extended blocking of traffic, may be dispersed, as a rule, only if the disruption is ‘serious and sustained’.” In any case, the onus is on the authorities to justify any restrictions.

Under international human rights law, states also have the obligation to prohibit and eliminate racial discrimination, including in the enjoyment of the right to security of the person and protection by the State against violence. The UN Human Rights Committee clearly stated that “... peaceful assemblies may not be used for propaganda for war (...) or advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence (...). As far as possible, action should be taken in such cases against the individual perpetrators, rather than against the assembly as a whole.”

Amnesty International has produced reports outlining good practices on the **policing of assemblies**, as well as guidelines on the **use of force by law enforcement officials**.

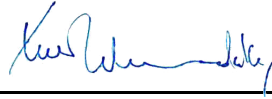
Topics

NEWS CANADA PUBLIC STATEMENTS

This is Exhibit “TTT” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



Français

ONTARIO REGULATION 69/22

made under the

EMERGENCY MANAGEMENT AND CIVIL PROTECTION ACT

Made: February 11, 2022 (3:46 p.m.) Filed: February 11, 2022

Published on e-Laws: February 11, 2022

Printed in The Ontario Gazette: February 26, 2022

DECLARATION OF EMERGENCY

WHEREAS the interference with transportation infrastructure, including essential trade corridors, and other critical infrastructure that is currently occurring in locations throughout the Province prevents the movement of people and the delivery of essential goods and services and constitutes a danger of major proportions that could result in serious harm to persons and substantial damage to property;

AND WHEREAS the criteria set out in subsection 7.0.1 (3) of the *Act* have been satisfied;

NOW THEREFORE, an emergency is hereby declared pursuant to section 7.0.1 of the *Act* in **the whole of the Province of Ontario**.

Made by:

Pris par :

Le premier ministre,

DOUG FORD

Premier

Date and time: February 11, 2022 (3:46 p.m.)

Date et heure : 11 février 2022 (15 h 46)

Français



Français

ONTARIO REGULATION 70/22

made under the

EMERGENCY MANAGEMENT AND CIVIL PROTECTION ACT

Made: February 12, 2022 (10:17 a.m.) Filed: February 12, 2022

Published on e-Laws: February 12, 2022

Printed in The Ontario Gazette: February 26, 2022

CONFIRMATION OF DECLARATION OF EMERGENCY

WHEREAS the interference with transportation infrastructure, including essential trade corridors, and other critical infrastructure that is currently occurring in locations throughout the Province prevents the movement of people and the delivery of essential goods and services and constitutes a danger of major proportions that could result in serious harm to persons and substantial damage to property;

AND WHEREAS the criteria set out in subsection 7.0.1 (3) of the *Act* have been satisfied;

NOW THEREFORE, the declaration of emergency made by the Premier on February 11, 2022 at 3:46 p.m. is hereby confirmed pursuant to section 7.0.1 of the *Act* in **the whole of the Province of Ontario**.

Français



Français

ONTARIO REGULATION 71/22

made under the

EMERGENCY MANAGEMENT AND CIVIL PROTECTION ACT

Made: February 12, 2022 (10:17 a.m.) Filed: February 12, 2022

Published on e-Laws: February 12, 2022

Printed in The Ontario Gazette: February 26, 2022

CRITICAL INFRASTRUCTURE AND HIGHWAYS

1. The terms of this Order are set out in Schedule 1.

**SCHEDULE 1
CRITICAL INFRASTRUCTURE AND HIGHWAYS**

Interpretation

1. In this Order,

“critical infrastructure” means,

- (a) 400-series highways,
- (b) airports,
- (c) canals,
- (d) hospitals,
- (e) infrastructure for the supply of utilities such as water, gas, sanitation and telecommunications,
- (f) international and interprovincial bridges and crossings,
- (g) locations where COVID-19 vaccines are administered,
- (h) ports,
- (i) power generation and transmission facilities, and
- (j) railways; (“infrastructures essentielles”)

“provincial offences officer” has the same meaning as in subsection 1 (1) of the *Provincial Offences Act*. (“agent des infractions provinciales”)

Impeding access or egress re critical infrastructure

2. (1) No person, whether acting individually or in cooperation with others, and whether through the use of a motor vehicle or by any other means, shall,

(a) impede access to or egress from, or the ordinary use of, critical infrastructure; or

(b) directly or indirectly cause such access, egress or ordinary use to be impeded.

(2) No person shall provide assistance to an individual to knowingly aid the individual to do anything prohibited by subsection (1), including by providing supplies, fuel or other materials.

Impeding access or egress re highways

3. (1) No person shall impede access to or egress from, or the ordinary use of, any highway, walkway or bridge where such impediment has the effect of,

(a) preventing the delivery of essential goods or services;

(b) severely disrupting ordinary economic activity; or

(c) causing a serious interference with the safety, health or well-being of members of the public.

(2) For greater certainty, subsection (1) does not prohibit an impediment that is trivial, transient, or minor in nature or where users of the highway, walkway or bridge can easily avoid the impediment.

(3) In this section,

“highway” means a highway as defined in the *Highway Traffic Act*, other than a 400-series highway.

Order

4. (1) A police officer or other provincial offences officer who has reasonable grounds to believe that one or more individuals are in contravention of section 2 or 3 may,

(a) order the individual to cease contravening the section;

(b) where there is more than one individual, order the individuals to disperse; and

(c) order the individual to remove any object that the individual used in the contravention, whether the object was used in the contravention before or after this Order takes effect.

(2) Every individual to whom an order is issued under subsection (1) shall promptly comply with it.

(3) If an individual fails to promptly remove an object after being ordered to do so under clause (1) (c), then a police officer or other provincial offences officer may remove the object.

Order re removal of vehicle

5. (1) Where a vehicle owned or operated by an owner or operator is used in the contravention of section 2 or 3, the Registrar, a police officer or other provincial offences officer may order the owner or operator to remove the vehicle.

(2) Notice of an order made under subsection (1) may be given by any means that the person giving notice believes may be reasonable to bring the order to the attention of the owner or operator.

(3) An owner or operator who receives notice of an order made under subsection (1) shall promptly cause the vehicle to be removed.

(4) If an owner or operator fails to comply with subsection (3), a police officer or other provincial offences officer may cause the vehicle to be removed.

(5) For the purposes of this section,

“operator” means,

- (a) an operator as defined in subsection 16 (1) of the *Highway Traffic Act*, or
- (b) in the absence of evidence to the contrary, where there is no CVOR certificate, national safety code number under the *Motor Vehicle Transport Act* (Canada), or lease applicable to the vehicle, the holder of the plate portion of the permit for the vehicle; (“utilisateur”)

“owner” includes,

- (a) the holder of a permit as defined in section 6 of the *Highway Traffic Act*, and
- (b) the holder of the permit corresponding to the number plate issued under section 7 of the *Highway Traffic Act* that is displayed on the vehicle. (“propriétaire”)

Permits, licences and certificates under the *Highway Traffic Act*

6. (1) Despite anything in the *Highway Traffic Act*, where the Registrar or Deputy Registrar believes on reasonable grounds that,

- (a) the holder of a driver’s licence, motor vehicle permit or CVOR certificate has contravened section 2 or 3 or has failed to comply with subsection 4 (2) or 5 (3); or
- (b) the holder of a CVOR certificate was the operator of a motor vehicle that was used in or during a contravention of section 2 or 3,

the Registrar or Deputy Registrar may, by order, suspend or cancel the driver’s licence, plate portion of the permit or CVOR certificate.

(2) A person has no right to be heard before the Registrar or Deputy Registrar makes an order under subsection (1).

(3) The Registrar or Deputy Registrar may give or provide notice of an order made under subsection (1) by any means that the Registrar or Deputy Registrar believes may be reasonable to bring the order to the attention of the person affected.

(4) An order made under subsection (1) takes effect on the date and at the time set out in the order, whether or not the person affected has received notice of the order.

(5) If the permit for a motor vehicle has been suspended or cancelled by an order made under subsection (1), a police officer or other provincial offences officer may seize any number plates displayed on a motor vehicle, including any number plates issued by another jurisdiction.

(6) In this section,

“CVOR certificate” has the same meaning as in section 1 of the *Highway Traffic Act*; (“certificat d’immatriculation UVU”)

“driver’s licence” has the same meaning as in section 1 of the *Highway Traffic Act*, and includes a driver’s licence issued by another jurisdiction; (“permis de conduire”)

“operator” has the same meaning as in subsection 16 (1) of the *Highway Traffic Act*; (“utilisateur”)

“permit” has the same meaning as in section 6 of the *Highway Traffic Act*, and includes a permit issued by another jurisdiction; (“certificat d’immatriculation”)

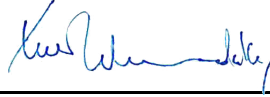
“Registrar” and “Deputy Registrar” mean the Registrar of Motor Vehicles and any Deputy Registrar of Motor Vehicles appointed under the *Highway Traffic Act*. (“registrator”, “registrator adjoint”)

Français

This is Exhibit “UUU” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



Windsor Police Service News Update

Date: Friday, February 11, 2022

PUBLIC NEWS UPDATE

Message to Demonstrators from Windsor Police Service

The Windsor Police Service wants to make demonstrators clearly aware that it is a criminal offence to obstruct, interrupt or interfere with the lawful use, enjoyment, or operation of property. The offence itself is known as mischief to property.

The unlawful act of blocking streets at and near the Ambassador Bridge is resulting in people being denied the lawful use, enjoyment and operation of their property and causing businesses to close down.

We are providing notice that anyone blocking streets or assisting others in the blocking of streets may be committing a criminal offence and must immediately cease further unlawful activity or you may face charges. You could be arrested if you are a party to the offence or assisting others in the direct or indirect commission of this offence.

Vehicles or other property related to an offence may be seized. Once a vehicle is seized, it may be detained and, following a conviction, possibly forfeited.

Charges and/or convictions related to the unlawful activity associated with the demonstration may lead to denial in crossing the USA border.

For further information:

Contact the WPS Corporate Communication Unit's Public Information

Officer at (519) 255-6700 ext. 4204.

Content posted by:

Constable Talya Natyshak
Corporate Communications Unit
Windsor Police Service - Headquarters
Windsor, Ontario, Canada
Office: (519) 255-6700 ext. 4204

Latest News

[February-28-2022-Update-1](#)

[February-25-2022-Update-1](#)

[February-24-2022-Update-1](#)

[February-23-2022-Update-1](#)

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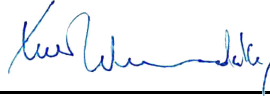
Select Language | ▼

© 2022 Windsor Police Service, 150 Goyeau St. Windsor, ON N9A 6V2, Emergency: 911, Non-Emergency: 519-258-6111, E-mail Us

This is Exhibit “VVV” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



Injunction granted to clear Ambassador Bridge blockade after Doug Ford announces state of emergency

JEFF GRAY > QUEEN'S PARK REPORTER

MARIEKE WALSH >

CARRIE TAIT >

ERIC ATKINS > TRANSPORTATION REPORTER

PUBLISHED FEBRUARY 11, 2022



Protesters meet to decide if they should maintain their anti-public-health-measures blockade at the Ambassador Bridge on Feb. 11. An injunction to clear the border crossing went into effect at 7 p.m. ET.

CARLOS OSORIO/REUTERS

Protesters who have been blocking the Ambassador Bridge, Canada's most important trade artery with the U.S., on Friday faced a provincial state of

emergency that could mean \$100,000 fines or jail terms, and declarations from both the Prime Minister and the U.S. President that the disruption must end.

In addition, an Ontario Superior Court judge granted an injunction against the protests at the bridge, which goes from Windsor, Ont., to Detroit, ordering demonstrators to clear the area. Lawyers for the City of Windsor and the auto industry sought the order, saying the blockades forced the shutdown of auto plants and local schools.

The judge gave protesters until 7 p.m. to clear out, but crowds continued to grow after that, and it remained unclear when many would leave.

At Queen's Park, Ontario Premier Doug Ford declared a state of emergency, both to deal with the situation at the U.S. border and what he called a "siege" in Ottawa, saying his cabinet will enact orders threatening anyone who blocks bridges, highways or other "critical infrastructure" with heavy fines and up to a year in jail.



Ontario Premier Doug Ford attends a news conference at the Queen's Park Legislature in Toronto on Feb. 11.

CHRIS YOUNG/THE CANADIAN PRESS

Business groups call on governments to end border blockades in open letter**Health Minister expects federal government to announce changes to COVID-19-related border restrictions next week**

Speaking in Ottawa, Prime Minister Justin Trudeau said the borders would reopen but that he couldn't provide details on timing or how the blockades would be stopped because "we are concerned about violence."

Mr. Trudeau spoke with U.S. President Joe Biden on Friday about the disruptions at border crossings in Ontario, Manitoba and Alberta.

"President Biden and I both agree that for the security of people and the economy, these blockades cannot continue. So make no mistake, the border cannot and will not remain closed," the Prime Minister said.

In a readout from the meeting, the White House said Mr. Trudeau promised the President that "quick action" would be taken. It also said that the U.S. administration and Michigan Governor Gretchen Whitmer are providing assistance but did not elaborate.

A source with knowledge of the meeting told The Globe and Mail that officials in the U.S. have offered up tow trucks to help deal with the Ambassador Bridge blockade. The Globe is not identifying the source because they were not permitted to disclose the internal plans.

The Prime Minister said he also raised the issue of U.S. involvement in the protests. Mr. Trudeau told reporters that on some fundraising sites, the percentage of funds coming from the U.S. is "approaching 50 per cent." He also said he discussed the U.S.-based flooding of Ottawa's 911 system this week, and the presence of U.S. citizens at the blockades.

Prime Minister Justin Trudeau speaks on Parliament Hill during a media availability about the ongoing protests in Ottawa and blockades at various Canada-U.S. borders on Feb. 11.

JUSTIN TANG/THE CANADIAN PRESS

The Ontario Premier said blocking the Ambassador Bridge threatens hundreds of millions of dollars a day in two-way trade between Canada and the U.S., and puts hundreds of thousands of Ontario jobs at risk. He also said those blocking Ottawa streets with trucks were taking a part in an “illegal occupation” and urged them to leave, including those who have brought children to both protests.

“To those who have attempted to disrupt our way of life by targeting our lifeline for food, fuel and goods across our borders, to those trying to force a political agenda through disruption, intimidation and chaos, my message to you is this. Your right to make a political statement does not outweigh the right of hundreds of thousands of workers to earn their living,” Mr. Ford said.

“Your right to make a political statement does not outweigh the rights of one million people in Ottawa to live peacefully, free of harassment and chaos in their own homes.”

Under Ontario's emergency legislation, used in the pandemic several times already, the Premier can declare a state of emergency himself but his cabinet must ratify it within 72 hours. Cabinet was expected to meet Saturday, if not sooner, to approve the declaration and the emergency orders. The initial state of emergency lasts 14 days. It can be renewed for another 14 days before going before the legislature for a vote.

Mr. Ford said he is also looking at orders that would empower the government to go after the personal and commercial drivers' licences of protesters who refuse to leave.

The opposition NDP has been urging the government to suspend commercial trucking licences for those involved. But Ivana Yelich, a spokeswoman for Mr. Ford, said government lawyers did not believe current legislation allowed for licences to be seized after vehicles were used in a protest.

Mr. Ford also said he intended to make the emergency orders and penalties permanent, with legislation in the coming spring session, which starts Feb. 22.

The Premier said the province's public-health restrictions, already being lifted on a gradual timeline, were necessary to keep overwhelmed hospitals from turning away patients. But he said the province is "on track to very soon" remove most restrictions on businesses.

And Mr. Ford pointed to comments this week from Ontario Chief Medical Officer of Health Kieran Moore, who said the province's vaccine passport system is under review and that he will present options to the government next week on a timeline for ending it, as hospital admissions continue to decline.

But the Premier said he was not moving faster to placate the protesters: "I will never, ever negotiate with people that break the law ... people that are in there illegally occupying cities. I base it on health. I base it on science."

Susan, an anti-public-health-measures protester who wouldn't give her last name, walks past police officers after yelling at counter-protesters at the Ambassador Bridge in Windsor, Ont., on Feb. 11.

THE GLOBE AND MAIL

Meanwhile, RCMP in Manitoba on Friday confirmed protesters at the U.S. border crossing near Emerson, Man., are still allowing emergency vehicles and trucks hauling livestock to pass through a blockade of about 50 semis, pieces of farm machinery and passenger vehicles.

Manitoba Premier Heather Stefanson on Friday said the province will accelerate its plan to roll back COVID-19 restrictions and expects to have all public-health orders lifted in the coming weeks.

In Alberta, protesters have organized weekend convoys across the province, with Edmonton, Calgary and Milk River as key destinations.

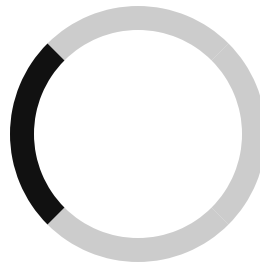
They set up camp at the police checkpoint just south of Milk River last week, and the demonstration ballooned on the weekend. The police barricade was established to limit access to the protest in Coutts, which is blocking traffic at the U.S. border.

Between 200 and 250 vehicles were gathered at the Milk River site early Friday afternoon, according to RCMP Corporal Troy Savinkoff. About 75 to 100 vehicles, including farm equipment, remained at the protester blockade in Coutts.

In British Columbia, a protest against COVID-19 health measures has been taking place at Surrey's Pacific Highway U.S. border crossing since Saturday.

With reports from Xiao Xu and The Canadian Press

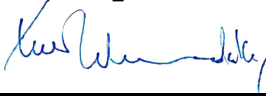
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This is Exhibit "WWW" mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

**▲ Update on City of Windsor Operations in Light of the Coronavirus (COVID-19)**

Ontario Superior Court Grants Injunction



February 11, 2022

View: [Ontario Superior Court Order](#)

After hearings held on Thursday February 10 and Friday February 11, 2022 Chief Justice Morawetz of the Ontario Superior Court of Justice granted an injunction to restrain individuals from establishing a blockade, or in any way impeding access, to the Ambassador Bridge.

Effective 7:00 pm on Friday, February 11, 2022, any persons having notice of the Order granting the injunction are restrained and enjoined from impeding or blocking access to the Ambassador Bridge and indirect or direct approaching roadways and access points for ten (10) days.

People remain at liberty to engage in a peaceful, lawful and safe protest that does not impede or block access to the Ambassador Bridge and approaching roadways. The terms of the Order and any applicable law must be complied with.

The Automotive Parts Manufacturers' Association (APMA), as representative plaintiff, and intervener the City of Windsor, provided evidence regarding the dramatic local, national and international economic consequences of the ongoing blockade. The Ontario Attorney General intervened in support of the injunction, and the Canadian Vehicle Manufacturers' Association joined to support the APMA's request.

Windsor-Essex is home to the largest auto cluster in North America. Vehicle parts cross the border an average of seven times before finished vehicles roll off the lines. The Windsor-Detroit trade corridor is one of the busiest commercial border crossing in the world; it is estimated that more than \$450 million in goods cross the Windsor-Detroit border every day, representing one-third of all surface trade between Canada and the USA.

More than 6,500 people residing in the Windsor-Essex area work outside of Canada, nearly all of whom commute across the Windsor-Detroit border.

Windsor-Essex boasts an industry profile of more than 1000 manufacturers, \$4.5 billion of manufactured goods produced in annual GDP – 30% of the region's total GDP production, 90-plus auto and parts manufacturers and an excess of 250 machine, tool, die and mold companies which are all key components of the integrated global value chain.

70-80% of Ontario's greenhouse produce is exported to the United States. There are over 3,200 acres of vegetable greenhouses in Ontario with approximately 2,600 acres (or 80%) in Windsor-Essex. Ontario agriculture exports to the U.S in 2016, totaled \$683.5 million.

Law enforcement will collaborate and coordinate to assess next steps for ensuring compliance with the Court's order. No operational details will be disclosed, to ensure the safety and security of all involved.

Latest News

City to Host Virtual Engagement on the Multi-Residential Interim Control By-law Study

City of Windsor and ENWIN 2022 Public Salary Disclosure

Windsor, Ontario, to Be Home to First Large-Scale Electric Vehicle Battery Plant in Canada

Reduce the Risk of Flooding by Taking Action in Your Home

Residents Invited to Celebrate Earth Hour

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© City Of Windsor

ONTARIO
SUPERIOR COURT OF JUSTICE

CHIEF JUSTICE GEOFFREY B. MORAWETZ)
)
) FRIDAY, THE 11TH DAY
) OF FEBRUARY, 2022

B E T W E E N:

AUTOMOTIVE PARTS MANUFACTURERS' ASSOCIATION



Plaintiff/
Moving Party

- and -

JIM BOAK, JOANNE CALLAWAY, HILDA FISHER,
LORI INVERARITY, LEO LUCIO, GIL PONTE, MANBAE SINGH-GALL
DARLENE THOMPSON and JOHN DOE

Defendants/
Responding Parties

- and -

THE CORPORATION OF THE CITY OF WINDSOR,
ATTORNEY GENERAL FOR ONTARIO

Interveners

ORDER

THIS MOTION, made by the Plaintiff for an interim interlocutory injunction pursuant to section 101 of the *Courts of Justice Act*, Rule 40.01 of the *Rules of Civil Procedure*, and section 440 of the *Municipal Act, 2001*, was heard at Windsor on February 11, 2022 by videoconference.

UPON READING the Affidavits contained within the Motion Record of the Plaintiff dated February 10, 2022, the Supplementary Motion Record of the Plaintiff dated February 11, 2022, and the Motion Record of The Corporation of the City of Windsor dated February 11, 2022,

the Affidavit of Jason Bellaire sworn February 11, 2022, the Affidavit of Jason Ward Reynar sworn February 11, 2022, the Affidavit of Adam Blake-Gallipeau sworn February 11, 2022, and the Affidavit of Dr. Clifford Rosen sworn February 11, 2022, and upon hearing oral arguments of counsel for the Automotive Parts Manufacturers' Association, The Corporation of the City of Windsor, the Attorney General of Ontario, The Democracy Fund, John Doe, and with Kristian Langenfield making oral arguments on behalf of himself, with no one attending for the Defendants or any other any person having an interest in this matter, although duly served in accordance with the Endorsement of this Court dated February 11, 2022.

1. **THIS COURT ORDERS** that the time for service, filing and confirmation of the Notice of Motion and the Motion Record is hereby abridged so that this Motion is properly returnable today.

2. **THIS COURT ORDERS** that the Plaintiff is authorized to bring this Motion and the underlying proposed proceeding on behalf of all members of the Automotive Parts Manufacturers' Association pursuant to Rule 10.01(1)(f) of the *Rules of Civil Procedure*.

3. **THIS COURT ORDERS** that an interim interlocutory injunction is granted, effective February 11, 2022, at 7:00 PM, pursuant to section 101 of the *Courts of Justice Act*, Rule 40.01 of the *Rules of Civil Procedure* and section 440 of the *Municipal Act, 2001*.

4. **THIS COURT ORDERS** that the Defendants and any persons having notice of this Order are hereby restrained and enjoined from impeding or blocking access to the Ambassador Bridge

and indirect or direct approaching roadways and access points for ten (10) days from the date of this Order.

5. **THIS COURT ORDERS** that any police officer with the Windsor Police Service, the Ontario Provincial Police, and any other police authority (the “Police”), shall have authorization to arrest and remove any person who has knowledge of this Order and who the Police have reasonable and probable grounds to believe is contravening or has contravened any provision of this Order.

6. **THIS COURT ORDERS** that the Police or designated agents shall have authorization to remove any vehicles, personal property, equipment, structures, or other objects that impede or block access to the Ambassador Bridge and approaching roadways.

7. **THIS COURT ORDERS** that the Police shall retain discretion:

- a. as to the timing and manner of enforcement of this Order, and specifically retained discretion as to the timing and manner of arrest and removal of any person pursuant to this Order;
- b. to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has contravened, any provision of this Order, upon that person agreeing to abide by this Order; and
- c. and to lay any charges or take any other lawful action.

8. **THIS COURT ORDERS** that any peace officer and any member of the Police who arrests or arrests and removes any person pursuant to this Order shall have authorization to release that person from arrest upon that person agreeing in writing to obey this Order

9. **THIS COURT ORDERS** that the Defendants and other persons remain at liberty to engage in a peaceful, lawful and safe protest, that does not impede or block access to the Ambassador Bridge and approaching roadways. For greater certainty, the terms of this Order and any applicable law must be complied with.

10. **THIS COURT ORDERS** that notice of this Order shall be given by the creation of a URL whereby this Order can be viewed and downloaded, with the Plaintiff, The Corporation of the City of Windsor, and the Attorney General of Ontario issuing press releases containing the URL linking to the Order and the date, time and location of the hearing date contemplated in paragraph 14 of this Order.

11. **THIS COURT ORDERS** that notice of this Order may be given in the following manners:

- a. by posting copies of this Order in or around the City of Windsor;
- b. reading the Order to any person, including but not limited to reading the Order over an amplification system;
- c. publishing this Order online; and
- d. any other manner deemed appropriate by the parties or the Police.

12. **THIS COURT ORDERS** that this Order shall not apply to persons acting in the course of or in the exercise of a statutory duty, power or authority.

13. **THIS COURT ORDERS** that costs of this Motion shall be in the cause, subject to the Orders granting the interveners standing.

14. **THIS COURT ORDERS** that the parties and any person having an interest in this matter shall appear before the Court in Windsor by videoconference on February 18, 2022 at 10:00 am for the hearing of a motion to continue this Order.



CHIEF JUSTICE GEOFFREY B. MORAWETZ

AUTOMOTIVE PARTS MANUFACTURERS' ASSOCIATION

v.

JIM BOAK et al

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT WINDSOR

ORDER

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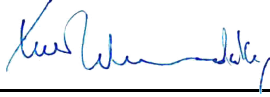
LAWYERS FOR THE PLAINTIFF

Our File: 80695

This is Exhibit "XXX" mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



POLITICS

U.S. pressures Canadian authorities to end border blockades

PUBLISHED FRI, FEB 11 2022•12:28 AM EST UPDATED FRI, FEB 11 2022•10:02 AM EST

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KEY POINTS

The Canadian government is coming under increasing pressure from the United States to resolve anti-vaccine mandate protests that are impacting the economy in both countries with border blockades, including a 5-day shutdown of the vital Ambassador Bridge.

The closure of the bridge has halted some auto output and left officials scrambling to limit economic damage.

Canadian Prime Minister Justin Trudeau said he was working with municipal leaders to end the blockade.

Public Safety Minister Marco Mendicino said federal police forces would be deployed to Windsor, near the bridge, and to Ottawa.



The Canadian government is coming under increasing pressure from the United States to resolve anti-vaccine mandate protests that are impacting the economy in both countries with border blockades, including a 5-day shutdown of the vital Ambassador Bridge.

The “Freedom Convoy” by Canadian truckers opposing a vaccine-or-quarantine mandate for cross-border drivers, mirrored by the U.S. government, began with the occupation of the Canadian capital, Ottawa. The truckers then blocked the Ambassador Bridge earlier this week and shut down two other smaller border crossings.

The closure of the bridge, North America’s busiest international land border crossing and a key supply route for Detroit’s carmakers, has halted some auto output and left officials scrambling to limit economic damage.

Michigan Governor Gretchen Whitmer on Friday said she has been pushing the Canadian government to get the protest under control and that the bridge blockade was hurting her state.

“The Canadian government has to do whatever it takes to safely and swiftly resolve this,” Whitmer told CNN in an interview.



Canadian bridge blockade continues, auto plants face shutdowns amid disruptions

The Biden administration on Thursday urged Canada to use federal powers to ease the disruption.

Canadian Prime Minister Justin Trudeau said he was working with municipal leaders to end the blockade. Public Safety Minister Marco Mendicino said federal police forces would be deployed to Windsor, near the bridge, and to Ottawa.

Mendicino is scheduled to speak with U.S. Homeland Security Secretary Alejandro Mayorkas on Friday, his office confirmed. Ontario's provincial government was also expected to make an announcement about the protests on Friday.

Police in Windsor, Ontario, which borders Detroit, said they had received additional resources from outside jurisdictions to "support a peaceful resolution to the current demonstration at and near the Ambassador Bridge."

In Ottawa, the epicenter of the protests, police were waiting on Thursday for a request for provincial and federal reinforcements to be completed. They have made 25 arrests so far. City police chief Peter Sloly expects the reinforcements to arrive in the next 48 hours ahead of a potential rise in protesters in the city over the weekend.

"This is an entirely sophisticated level of demonstrators. They have the capability to run strong organization here provincially and nationally, and we're seeing that play out in real time," Sloly told reporters.



VIDEO 01:43

Protesters disrupt crucial trade link between U.S. and Canada

Canada sends 75% of its exports to the United States and the bridge usually handles 8,000 trucks a day, representing a quarter of all cross-border trade, or about C\$500 million (\$392.56 million) per day.

About C\$100 million worth of auto parts cross the border each day, with many shipments timed to arrive just as manufacturers need them.

[General Motors](#), [Ford Motor](#), Chrysler parent [Stellantis](#) and [Toyota Motor](#) have been impacted by the blockades.

While officials at the federal, provincial and municipal levels have held regular meetings, they have had limited impact on the ground.

Windsor Mayor Drew Dilkens has sought an injunction from the Ontario Superior Court to have the protesters at the bridge removed, adding that he was striving to resolve the issue peacefully and ensure that nobody gets hurt.

As many pandemic-weary Western countries near the two-year mark on coronavirus restrictions, copycat protests have spread to Australia, New Zealand and France, although the wave of infections caused by the highly infectious Omicron variant has begun to subside in some places.

(\$1 = 1.2737 Canadian dollars)

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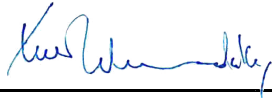


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A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

February 12, 2022

Ottawa, Ontario

Today, Prime Minister Justin Trudeau convened a meeting of the Incident Response Group, where he was joined by ministers and senior officials working to help provinces and municipalities get the situation under control and end the ongoing illegal blockades and occupations taking place across the country.

Ministers and officials updated the Prime Minister on the work underway with their provincial and municipal counterparts to end these blockades, including building on the Ontario government's announcement of stiffer fines and penalties. They committed to continue providing all appropriate available federal resources to protect public order and keep people and communities safe.

The group was briefed on the law enforcement action in Windsor, Ontario, led by the Ontario Provincial Police (OPP) with support from other police forces – including significant support from the RCMP. They emphasized the very real economic harm facing Canada as each hour passes where these illegal blockades remain unresolved. They reiterated their unwavering commitment to defend jobs, trade, and the economy.

The Prime Minister and ministers were briefed by the RCMP on their efforts to secure ports of entry in Coutts, Alberta, and Emerson, Manitoba, and prevent further blockades from emerging, working with local police in these jurisdictions.

Ministers and officials also updated the Prime Minister on their outreach to industry officials, as well as those responsible for critical infrastructure such as airports, ports, and railways, to ensure that they have the resources in place to safeguard against disruptions and further blockades. The Prime Minister stressed that border crossings cannot, and will not, remain closed, and that all options remain on the table.

Today, the OPP, the RCMP, and the Ottawa Police Service established an enhanced Integrated Command Centre in response to the escalation of the current occupation in Ottawa. Additionally, the Prime Minister and ministers discussed further immediate actions the federal government is considering, and will reconvene tomorrow.

They emphasized the urgent need for anyone participating in the blockades to return to their communities peacefully and immediately, and that consequences for breaking the law will be increasingly severe. The government's top priority remains to keep people and communities safe, and to protect jobs, trade, and our economy. These blockades must be brought to an end, and the federal government will continue working on every option to end them.

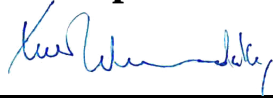
Associated link

- Prime Minister Justin Trudeau convenes the Incident Response Group
(<https://pm.gc.ca/en/news/readouts/2022/02/10/prime-minister-justin-trudeau-convenes-incident-response-group>)

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OTTAWA POLICE SERVICE
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Feedback

Ottawa Police Service Deploying All Available Officers to Enforce Neighbourhood Safety

Posted On Saturday February 12, 2022

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FOR IMMEDIATE RELEASE: Saturday, February 12, 2022 11:25am

(Ottawa) – The Ottawa Police Service continues to deploy all available resources to put an end to the unlawful demonstration in the downtown core, respond to calls for service, and improve neighbourhood safety.

Overnight, demonstrators exhibited aggressive behaviour towards law enforcement including refusing to follow directions, overwhelming officers, and otherwise subverting enforcement efforts.

All available officers were deployed last night. We have a plan to end this unlawful occupation and await the necessary reinforcements to do so.

We continue to monitor events across the province and adjust plans locally.

As of 10:30 AM EST, the Ottawa Police Service can report:

Enforcement and Charges Laid

- There have been 26 arrests in relation to criminal charges. Including two additional arrests for public intoxication.
- Police intercepted and recovered a stolen vehicle destined to join the occupation. This is the second stolen vehicle recovered in relation to the occupation.
- The Ottawa Police Service and the Ontario Ministry of Transportation (MTO) have launched a joint truck violation initiative. 3 vehicles have been placed out of service, and 10 charges have been issued including: moving violations, document offenses, lapsed inspection, and daily log infractions.
- Bylaw and Police Services have issued more than 2,600 tickets.

- Enforcement of new emergency measures will begin following their formal implementation by the province.

Intelligence and Investigations

- 140 active criminal offence investigations in relation to the demonstration.
- Intelligence and evidence gathering teams continue to collect financial, digital, vehicle registration, driver identification, insurance status, and other related evidence that will be used in criminal prosecutions.

Operations

- All available Ottawa Police Service officers remain on active duty.
- The Ottawa Police Service is working with policing partners and all levels of government to secure the necessary additional resources to put an end to the unlawful occupation.
- Officers were deployed to downtown school neighbourhoods on Friday in response to reports of demonstrators harassing children.

We encourage all residents who have witnessed or been the victim of unlawful behaviour to please contact the Ottawa Police at 613-236-1222 ext. 7300, or ext. 5015 for hate related crimes. Reports may also be submitted online at [**www.ottawapolice.ca**](http://www.ottawapolice.ca).

The Ottawa Police Service will continue to provide updates as they become available.

- 30 -

CONTACT:

Media Relations Section

Tel: 613-236-1222, ext. 5366

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Ottawa Police Service

P.O. Box 9634 Station T, Ottawa, Ontario, K1G 6H5

T: [613-236-1222](tel:613-236-1222), TTY: [613-232-1123](tel:613-232-1123)

[Email Us](#)

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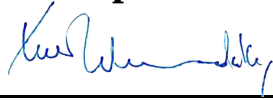
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UPDATE #2 – Emerson border crossing – February 12, 2022

 February 12, 2022

News release

 Emerson, Manitoba

Semi-trailers, farm implements, and passenger vehicles blocked access to the Canada/United States border at Emerson, Manitoba in the early morning hours of February 10, 2022.

Officers from the Emerson and Morris RCMP detachments have been on scene since the arrival of the vehicles, and have received assistance from other RCMP detachments and units throughout the province.

There was an initial estimate of 50 vehicles at the establishment of the blockade. As of 11:00am Central, on February 12, 2022, the number of vehicles participating in the blockade has remained largely unchanged. This number continues to fluctuate as vehicles arrive and depart the blockade.

All four lanes of Highway 75 at Provincial Road 200 are blocked. Police are advising motorists to expect substantial delays in the area and to avoid the Emerson area, if possible.

Emergency vehicles, including police vehicles, as well as some agriculture transports have been getting through the blockade, but otherwise there is no traffic flow in the area.

RCMP Divisional Liaison Officers continue to work with the protesters and organizers to reach a peaceful resolution to the blockade.

No tickets have been issued. No arrests have been made.

The Manitoba RCMP is aware of a planned protest on Highway 3 near Morden and Winkler taking place today. Officers will be present at points along the highway as well as having an officer stationed to keep the access point to the Boundary Trails Health Centre clear and accessible.

If anyone gets caught up in the convoy and is trying to access the Health Centre, we ask that they call 911 right away for assistance, as it is not always apparent that someone may not be a willing participant in the convoy, but is trying get to the hospital.

We are also aware of a number of planned demonstrations throughout the province today and throughout this weekend and are advising the public to expect delays due to convoys in the areas of Deacons Corner in the RM of Springfield, the Perimeter Highway around Winnipeg, and the Selkirk area. Officers will be on scene and monitoring all events.

–30–

Contact information

Manitoba RCMP Media Relations
204-983-8497

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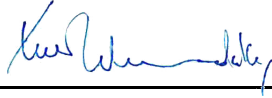
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British Columbia

Vaccine mandate protesters force highway closure at Canada-U.S. border in Surrey as rallies enter 3rd weekend

Convoy from Chilliwack joins protesters that had been blockading the Pacific Highway crossing since Feb. 5

CBC News · Posted: Feb 12, 2022 12:13 PM PT | Last Updated: February 12



Protesters at the intersection of 8th Avenue and 176 Street in South Surrey on Saturday Feb. 12, 2022. (Janella Hamilton/CBC News)

Thousands of people gathered at the Canada-U.S. border in Surrey, B.C., on Saturday for continued protests over pandemic mandates and restrictions, forcing police to close the main route to the Pacific Highway border crossing.

Protesters have been occupying the Pacific Highway crossing in South Surrey [since Feb. 5](#), with a convoy of protesters joining them from Chilliwack on Saturday morning.

The demonstration against public health measures is one of [several simultaneous rallies](#) across Canada entering their third weekend.

They come despite complaints [from local businesses and residents](#) who say they were threatened by protesters throughout the week, and numerous noise complaints due to loud honking.



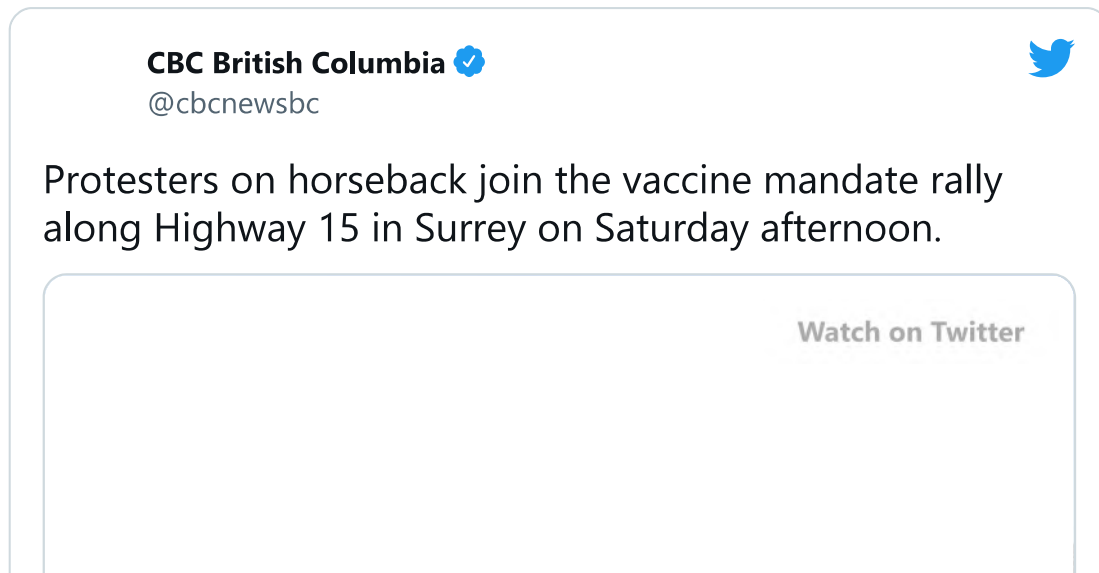
Protesters gathered at 8th Avenue and 176th Street in South Surrey on Saturday Feb. 12, 2022 to demand an end to vaccine mandates and other COVID-19 restrictions. (Janella Hamilton/CBC News)

"The impact of these blockades is choking already impacted supply chains, businesses and jobs. This is an unacceptable sabotage of the economy," said Anita Huberman, president of the Surrey Board of Trade, in a statement.

"To be clear, everyone has a right to peacefully protest, but these types of demonstrations are impacting businesses and livelihoods."

- [Surrey child-care centre says it's been disrupted by border protest](#)
- [City won't silence honking horns at Kelowna rallies, despite complaints](#)

The Board of Trade said they have signed a letter to the Prime Minister asking for measures to protect border infrastructure and issue immediate injunctions to "assert a clear message that lawlessness will not be tolerated."



The Surrey RCMP said protests at the border were for the most part peaceful, and protesters were engaging "diplomatically" with law enforcement officials.

In a release, officers said there was "significant" traffic congestion at [the intersection of 8 Avenue and 176 Street](#) from vehicles and people on foot. Police asked drivers to stay away from the area.

Earlier Saturday, protesters fully blocked the road leading to the border crossing, as RCMP had stopped protesters at the intersection.

As of 1 p.m. PT, the protesters' convoy were moving closer to the border, while trucks were being stopped by Mounties before they reached the border.

Police investigation

Police said some vehicles breached police barricades and drove the wrong way down 176 Street.

"While no injuries were reported as a result of the incident, this had the potential for harm to pedestrians and first responders," said the release. "This kind of behaviour will not be tolerated and is being investigated."

Protesters had completely encircled the intersection leading to the Pacific Highway border crossing on Saturday morning. (Janella Hamilton/CBC)

Around 6 p.m. PT police said crowds had begun to dissipate, but it is unclear if some protesters will stay at the site overnight.

Police said their goal, with help from the Canada Border Services Agency (CBSA), is to restore "the orderly flow of traffic in the safest manner possible."

[In a tweet](#), the CBSA said the Pacific Highway border remains open, but travellers could experience delays due to the protests in the area. On Sunday morning, a spokesperson for the CBSA confirmed that the advisory to expect delays remained in place as some protesters were still in the area.

Kelowna, Victoria protests

A similar protest was also [organized in Kelowna](#) on Saturday, with local leaders in the Okanagan city saying they had no plans to prevent the weekend rallies from happening.

Nicholas M. Pescod 

@npescod



Another [#FreedomConvoy](#) protest at the B.C. Legislature today.

Here's what I observed:

- Not as many people as last Saturday (didn't feel like it anyway) but still a sizable crowd
- Lots of noise & honking

In Victoria, hundreds of people gathered in front of the B.C. Legislature on Belleville Street on Saturday, where they waved flags and held signs demanding an end to current COVID-19 restrictions.

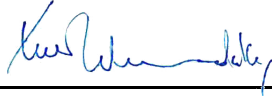
Police in Victoria says traffic was delayed along nearby Douglas Street but no roads were closed or blocked due to the protest.

With files from Jon Hernandez, Janella Hamilton and CHEK News

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FEDERAL POLITICS

Protesters square off with police at Ambassador Bridge, as demonstrations across Ontario continue despite emergency measures

Ottawa police insist they do not have the numbers to take on the protesters.

By **Tonda MacCharles** Ottawa Bureau

Jacob Lorinc Business Reporter

Jenna Moon Staff Reporter

Sat., Feb. 12, 2022 | ⌚ 6 min. read

🕒 Article was updated Feb. 13, 2022

[JOIN THE CONVERSATION \(308 \)](#)

While protests intensified around the country on Saturday following Ontario's new emergency measures, heavily armed police began clearing the week-long blockade of Canada's busiest commercial route.

The Ambassador Bridge remained closed to the public as of Saturday evening, keeping millions of dollars in commercial goods from flowing through the country as protesters decrying the country's pandemic restrictions squared off with at least six police forces dispatched to Windsor, Ont.

Early Saturday morning, police had successfully removed trucks blocking access to the storied suspension bridge spanning the Detroit River. But by the evening, a crowd of more than 100 protesters had congregated further south on Huron Church Rd. — the eight-lane artery leading to the bridge — keeping the road closed to drivers.

Protesters grew in numbers throughout the day, draped in Canada flags and "F-- You, Trudeau" memorabilia, many of them coming from around Windsor to join the rally. Some carried pro-Donald Trump flags and signs reading "Don't tread on me," while others covered their vehicles in handwritten messages disparaging Prime Minister Justin Trudeau and the media.

In a dramatic show of force, several hundred police began moving protesters at 8 a.m. Saturday morning, equipped with armoured vehicles, rifles, tear gas, rubber bullet guns and a military-style tactical unit from the RCMP.

Five public transportation buses were parked behind the line of officers, seemingly there to transport arrested demonstrators, while police drones monitored the crowd from overhead.

In a tweet, Windsor police said they had begun "active enforcement" early in the afternoon, towing and ticketing vehicles.

Jason Bellaire, Windsor's deputy police chief, said the protest marked the "biggest event I've ever dealt with."

"I've never experienced anything like this in my 27 years on the force," he said.

The seven-day protest shed light on the limited resources available to Windsor police, who scrambled to bring in reinforcements from police in Waterloo, Chatham-Kent and Hamilton ahead of Saturday's action.

The city's police also received help from the OPP and RCMP. According to Bellaire, the city borrowed tow trucks from Michigan to help clear vehicles from the bridge's entrance.

In Ottawa, the crowd of supporters of the so-called "Freedom Convoy" grew from a few hundred during the week to about 1,500 on the third weekend of protests, according to one policing source.

Saturday mid-afternoon, about 500 lingered on the lawn in front of the Peace Tower, where the Centennial Flame has been extinguished since the Friday night when protests began 16 days ago.

Protesters hauled down a protective fence that surrounded the National War Memorial since the first chaotic weekend when protesters urinated at the base of the memorial and danced on the Tomb of the Unknown Soldier. Several including at least three wearing what appeared to be service medals posed for photos, according to video that journalists streamed from the area.

Veterans Affairs Minister Lawrence MacAulay condemned the protesters' actions at the Cenotaph in a statement on Twitter.

"Completely unacceptable. Fences were put up to prevent the flagrant desecration and disrespect of our sacred monuments. This behaviour is disappointing and I'm calling on protesters to respect our monuments."

A counter demonstration organized Saturday saw several hundred residents opposed to the "Freedom Convoy" gather and march several blocks away from downtown Ottawa.

According to video posted Twitter by observers, some carried public service union flags, many chanted "End the occupation now" and "Hey hey, ho ho, fascist convoy's got to go."

Ottawa city councillor Catherine McKenney, who is running for mayor, said the "illegal occupation" is a national crisis with the local police force outnumbered. They said Canada is "complete and utter lawlessness with impunity."

Speaking to CBC, McKenney said the protesters are "making a mockery of us."

They said the protest was "certainly mismanaged from the beginning" but McKenney laid a lot of blame at the foot of other levels of government and policing as well.

Ottawa police "cannot manage what is happening," they said.

"We've been told by the federal government, by the province 'just ask for more resources.' We asked for more resources, we don't get them."

"Whether it's the OPP coming in or the RCMP coming in, that no longer matters, what we need is, we need a plan for this to end and for it to end soon," McKenney said.

Ottawa police had not moved to dismantle the downtown encampment on Parliament Hill insisting they do not have the numbers to take on the protesters.

"We have a plan to end this unlawful occupation and await the necessary reinforcements to do so," the Ottawa police said in a written release Saturday morning.

Overnight, protesters partied on the Hill, blaring horns, blasting tunes over loudspeakers below the Prime Minister's Office across from the Peace Tower, and moving a large tent structure and a Jumbotron screen onto Wellington Street.

On Saturday morning, television images showed two men soaking in a hot tub on the street facing Parliament, and no sign anyone was intending to leave anytime soon.

Police said that overnight, demonstrators "exhibited aggressive behaviour towards law enforcement including refusing to follow directions, overwhelming officers, and otherwise subverting enforcement efforts."

Police chief Peter Sloly said the force is focused on neighbourhood safety in the downtown core, but the statement Saturday morning issued shortly after the Ontario cabinet ratified new tougher regulations said enforcement of the new emergency measures "will begin following their formal implementation by the province."

To date, Ottawa police say they've made 26 arrests on criminal charges, and two for public drunkenness, recovered two stolen vehicles "in relation to the occupation," put three trucks "out of service," and issued 10 traffic-related charges "including moving violations, document offences, lapsed inspection and daily log infractions."

Overall, police and bylaw enforcement officers issued more than 2,600 tickets.

They say there are 140 “active criminal” investigations and teams are gathering “financial and digital” information, as well as “vehicle registration, driver identification, insurance status, and other related evidence that will be used in criminal prosecutions.”

Late Saturday the Ottawa police shifted strategies, announcing the set-up of an “integrated command centre” that will now share management of the crisis in Ottawa with the OPP and the RCMP.

In a statement issued, the Ottawa police said it was in “response to a significant influx of demonstrators into the Ottawa area and escalation of the current occupation.”

The force said there were more than 4,000 demonstrators throughout the day.

It said the integrated command centre “will allow us to make the most effective use of the additional resources our policing partners have provided to us.”

The move was seen by sources as one that was necessary before the RCMP and OPP dispatched further reinforcements.

The RCMP in a statement to the Star before the integrated command centre was announced said it “remains fully committed to providing the Ottawa Police Service (OPS) with the support and resources required to ensure the safety and security of residents and visitors in the National Capital Region.”

“The OPS continues to hold the operational lead and jurisdiction in regards to the ongoing demonstrations in Ottawa, and we are working collaboratively with them.”

In Toronto, a copycat convoy appeared to be smaller and calmer than its counterparts elsewhere in the province — and largely devoid of vehicles, due in part to pre-emptive road closures by Toronto Police Service. As a result, traffic has been snarled throughout the city.

Demonstrators, who were mostly peaceful, marched down Yonge Street, many carrying Canadian flags or wearing them draped over their shoulders. There is a heavy police presence in the city and law enforcement has blocked access to a large section of downtown to contain the protest, which is expected to congregate in front of Queen’s Park.

The Gardiner Expressway and Don Valley Parkway, both of which service the downtown core, were partially closed to traffic for roughly two hours Saturday afternoon. Police also temporarily prohibited people from carrying fuel cans in the city centre, citing public safety.

Trudeau and his cabinet’s incident response group met Saturday and were briefed by the RCMP about efforts “to secure ports of entry in Coutts, Alberta, and Emerson, Manitoba” and to stop other blockades from emerging, the PMO said late in the evening.

A readout of the meeting said Trudeau and ministers “discussed further immediate actions the federal government is considering.”

It said protesters would face increasingly severe penalties for breaking the law.

“The Prime Minister stressed that border crossings cannot, and will not, remain closed, and that all options remain on the table,” the statement said. The cabinet group meets again Sunday.



Jacob Lorinc is a Toronto-based reporter covering business for the Star. Reach him via email: jlorinc@thestar.ca

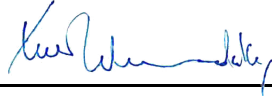
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Ottawa

Afternoon News with Mark Day and Danielle B

CityNews
Everywhere

Protesters tear down fence erected to protect National War Memorial

The Canadian Press, CityNews staff

Feb 12, 2022 5:17 PM

*Photo Credit: David Smith, CityNews Ottawa*[Listen to this article](#)

00:01:19

Protesters have torn down a fence that was erected around the National War Memorial.

The fence had been set up after the first weekend of demonstrations in the nation's capital, when some protesters stood and danced on the Tomb of the Unknown Soldier at the base of the memorial.

Police stood by and watched as dozens of demonstrators tore down the fence before gathering around the monument dedicated to Canada's war dead.

No one was seen standing on the Tomb of the Unknown Soldier, which was covered in flowers, and it wasn't immediately clear where the fence had gone.

Some politicians took to Twitter to condemn the removal of the fence. They called on protesters to be respectful of the city's monuments.

"Completely unacceptable," tweeted Lawrence MacAuley, Canada's minister of veterans affairs. "Fences were put up to prevent the flagrant desecration and disrespect of our sacred monuments. This behaviour is disappointing and I'm calling on protesters to respect our monuments."

Canada's Minister of National Defence Anita Anand also tweeted her displeasure.

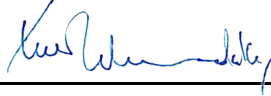
"The National War Memorial and the Tomb of the Unknown Soldier are sacred ground," Anand wrote. "These acts of desecration are entirely unacceptable. These hallowed places honour the past and ongoing service of our @CanadianForces, and they must be treated with the utmost respect."



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Detroit Free Press

MICHIGAN

Trucks are gone from Ambassador Bridge, but more protesters arrive on foot

Christine MacDonald, [John Wisely](#) and [Lily Altavena](#) Detroit Free Press

Published 8:42 a.m. ET Feb. 12, 2022 | Updated 8:53 p.m. ET Feb. 12, 2022

Several hundred demonstrators continue to protest near the Ambassador Bridge, despite a large police presence that initially pushed them back from the entrance.

Around 4:40 p.m., a crew used earth-moving equipment to position concrete barricades across Huron Church Road, which carries traffic to the tollbooths of the bridge. The move seemed to indicate the bridge would not reopen anytime soon.

The barricades were the first moves of the afternoon after a busy morning.

Detroit Free Press

But around noon, new protesters appeared to join them, growing their ranks to several hundred.

Earlier in the morning, Windsor police wearing neon yellow vests over their uniforms appeared to outnumber the remaining protesters and warned them over a public address system that they would be arrested if they didn't leave.

The interactions between the two groups remained calm and there didn't appear to be any arrests yet. One police officer was seen giving hand warmers to children at the protest.

About 8:15 a.m., protesters in pickups left voluntarily honking their horns as they drove away on Huron Church Road. An hour later, the semis pulled out, blasting their air horns as they went. A crowd of people on foot remained.

About 9:50 a.m., a line of police began walking slowly toward them, prompting a few more to leave. About 10:15 a.m. dozens more police arrived, flanking the protesters, though the crowd remained calm.

Some protesters danced to music that was playing. Others used their cellphones to shoot photos and video of the protest.

The departures started after additional police arrived about 8:15 a.m. and brought with them a school bus, four other municipal buses and a van labeled "offender transport." Four large pickups with city of Windsor logos on the side also were on the scene.

Some protesters packed up their things. The owners of a large green tent, which had sheltered a propane grill and some food tables, took it down and hauled away the items underneath it.

Two other protesters pushed brooms to clean up debris left in the street. A third one carried a black trash bag to collect the garbage while they chanted, "Clean up, clean up."

Detroit Free Press

anthem.

"We're still making our point. It's still shut down," said one protester named Dan who wouldn't give his last name. "We're still doing what we set out to do. Just send message to (Canadian Prime Minister Justin) Trudeau and (Ontario Premier Doug) Ford. End the mandates. End the passports and let us live our lives. We're sick and tired of it."

Dan described the protest as "peaceful, friendly and fun-loving."

"If they want to take the next step and turn it into us criminals, racists, misogynists; they are lying through their teeth," he said.

Another protester appeared more militant. He had a Canadian flag draped down his chest and a matching one down his back. He paced in front of stoic police officers, shouting, "Remember who you work for. Be Canadian."

The protesters spent the night in or near their trucks and emerged Saturday morning to 22-degree temperatures and a throng of media with their cameras pointed at them.

The scene had been mostly quiet in the morning and a nearby McDonald's was busy with people seeking coffee.

More: How truckers at the Ambassador Bridge hurt businesses, sparked protests around the world

More: Judge grants injunction to end Ambassador Bridge trucker blockade

The truckers say they object to Canada's mandate that they must be vaccinated against COVID-19.

The protest has shut down the busiest trade crossing between the U.S. and Canada and prompted calls for action from both the White House and Trudeau.

On Friday, a Canadian judge ordered the protesters to clear out or face arrest.

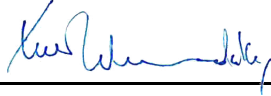
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UPDATE #3 – Emerson border crossing – February 13, 2022

📅 February 13, 2022

News release

📍 Emerson, Manitoba

As previously released:

Semi-trailers, farm implements, and passenger vehicles blocked access to the Canada/United States border at Emerson, Manitoba in the early morning hours of February 10, 2022.

Officers from the Emerson and Morris RCMP detachments have been on scene since the arrival of the vehicles, and have received assistance from other RCMP detachments and units throughout the province.

Update:

There was an initial estimate of 50 vehicles at the establishment of the blockade. As of 2:30pm Central, on February 13, 2022, the number of vehicles participating in the blockade was approximately 75 vehicles. This number continues to fluctuate as vehicles arrive and depart the blockade.

All four lanes of Highway 75 at Provincial Road 200 remain blocked. Police are advising motorists to expect substantial delays and to avoid the Emerson area. The weather in the area is also extremely poor with officers reporting blizzard conditions.

Emergency vehicles, including police vehicles, as well as some agriculture transports continue to have access through the blockade, but otherwise there continues to be no traffic flow in the area.

To date, no tickets have been issued and no arrests have been made.

–30–

Contact information

Manitoba RCMP Media Relations
204-983-8497

www.rcmp-grc.gc.ca/mb (<http://www.rcmp-grc.gc.ca/mb>)

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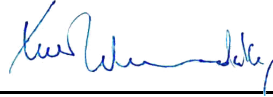
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Update: Arrests at protest near Pacific Highway Border Crossing

Surrey

2022-02-13 14:48 PST

Surrey RCMP is confirming that four people have been taken into custody for Mischief at the protests taking place near the Pacific Highway Border Crossing.

In addition, some of the vehicles and protestors who stayed overnight Saturday have now packed up and left the area.

The area near the border remains blocked off by police on 176 Street and feeder routes, and the border crossing remains closed at this time.

The public is asked to continue to avoid the area. The road closures listed earlier remain in effect.

For media inquiries contact:

Cpl. Vanessa Munn
Media Relations Officer
Surrey RCMP Media Relations Unit
Office: 604-599-7776

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Update on situation near the Pacific Highway Border Crossing

Surrey

2022-02-13 11:52 PST

Surrey RCMP is providing an update on the situation near the Pacific Highway Border Crossing as of Sunday February 13th.

The public can expect to see continued traffic congestion and road closures in the area. At this time, the border crossing is closed to the public and Surrey RCMP is advising drivers and pedestrians to stay away from the area and use an alternate border crossing.

Currently, there is no access to 176 Street from 8th Avenue (south). 0 Avenue is blocked at 184 Street to westbound traffic. In addition, 172 Street is blocked at 8th Avenue to southbound traffic. Police are working with area residents to keep the neighbourhood near the border to local traffic only.

While the majority of protestors dissipated yesterday afternoon, a small group remained overnight. Police continue to monitor the situation alongside our provincial and federal RCMP partners as well as the Canada Border Services Agency.

In regards to yesterday's protests - while mainly peaceful, the actions of those who breached police barricades are under investigation. Police will be following up based on the evidence obtained at the time of the incident.

Members of the public are encouraged to check for road closure information on Drivebc.ca, and monitor local media for information and alternate routes, as there is significant traffic delays in all surrounding areas.

For media inquiries contact:

Cpl. Vanessa Munn

Media Relations Officer

Surrey RCMP Media Relations Unit

Office: 604-599-7776

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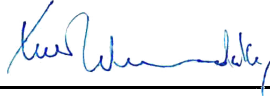
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Windsor Police Service News Update

Date: Sunday, February 13, 2022

PUBLIC NEWS UPDATE

Demonstration Update

Throughout this demonstration, Police have respected the protesters' freedom of expression and their right to a peaceful assembly. The importance of public safety remained the number one priority of officers with the goal being a peaceful resolution. Remaining committed to professionalism, keeping lines of communication open and using proper police discretion, guided our response to this major event.

The Windsor Police Service along with policing partners used a progressive approach by ensuring open lines of communication and continuous negotiations with protestors. During these negotiations, demonstrators were made aware that their actions were illegal and subject to arrest, specifically that they could be charged with mischief.

We also recognize the rights of the general public, local residents and businesses to a safe environment. Police used discretion during the course of the demonstration to avoid creating an unstable situation and potentially putting the public at risk. This exercising of police discretion should not be confused with lack of enforcement.

On Sunday, February 13, 2022, police at the demonstration site engaged protesters for the purpose of continued enforcement and several arrests were made. The arrested persons are all facing a

charge of mischief. Multiple vehicles within the demonstration area were also seized.

You will see a continued police presence in the area in order to maintain an environment that is safe. In an effort to work towards resuming traffic flow, a continuous assessment of the situation is vital to ensure a sustainable solution.

.

Content posted by:

Constable Talya Natyshak
Corporate Communications Unit
Windsor Police Service - Headquarters
Windsor, Ontario, Canada
Office: (519) 255-6700 ext. 4204

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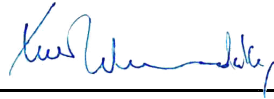
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Alberta RCMP make arrests at Coutts Border Blockade

📅 February 14, 2022

News release

📍 Coutts, Alberta



[\(/sites/default/files/styles/cropped_large/public/news-nouvelles/2022-02-14/rcmp_seizure_coutts.jpg?itok=oDxFjoL3\)](https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-make-arrests-coutts-border-blockade)

The Alberta RCMP recently became aware of a small organized group within the larger Coutts protest. Information was received that this group had access to a cache of firearms with a large quantity of ammunition. The group was said to have a willingness to use force against the police if any attempts were made to disrupt the blockade. This resulted in an immediate and complex investigation to determine the extent of the threat and criminal organization.

As a result of this investigation, the Alberta RCMP executed a search warrant during the early hours of Feb. 14, on three trailers associated to this criminal organization. This resulted in the arrest and detainment of 11 individuals.

As result of these search warrants, the following was seized:

- 13 long guns
- handguns
- multiple sets of body armour
- a machete
- a large quantity of ammunition
- high capacity magazines

An example of the militant mindset of a small segment of the protest, earlier in the evening, at approximately 8:00 p.m., a large farm tractor and a semi truck, both involved in the blockade, attempted to ram a police vehicle. The police officer was able to reposition and avoid the collision. RCMP officers followed the suspects to a location where the protesters were gathered. The driver of the tractor was identified and we are actively working to locate him so he can be taken into custody. The Alberta RCMP have seized the farm tractor and semi truck involved in this incident.

The Alberta RCMP wants to emphasize that our primary goal throughout this event has been and will continue to be the safety of the public, as well as our officers.

The Alberta RCMP will resume efforts to end the illegal blockade which has prevented access to the Coutts border. We encourage all participants who are involved in this illegal action to leave immediately or relocate to the designated site for the legal protest.

The Alberta RCMP will provide further updates as they become available.

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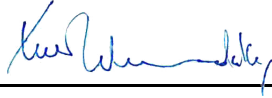
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Law enforcement activity continues near the Pacific Highway Border Crossing

Surrey

2022-02-14 13:06 PST

Surrey RCMP is providing an update on the situation near the Pacific Highway Border Crossing as of Monday February 14, 2022.

At this time, the border is open however; protest activity in the area has made it necessary to divert vehicle traffic to alternate border crossings. Pedestrians are also strongly encouraged to use alternate routes.

Currently, there is no access to 176 Street south of 8th Avenue. In addition, 0 Avenue is blocked at 184 Street to westbound traffic. Police continue to work with area residents to keep the neighborhood near the border to local traffic only.

Surrey RCMP is working with other provincial and federal RCMP units as well as the Canada Border Services Agency in response to this situation. Enforcement action is continuing today and officers are engaged with protesters in the area.

The RCMP respects the right to peaceful protest but unlawful activity will not be tolerated. Investigations into unlawful activity, including dangerous driving that occurred over the weekend are ongoing.

"Over the weekend I was on scene to support policing operations and to assess the situation on Highway 15 firsthand. I understand the frustration of the public who wish to see this situation end," said A/Commr. Brian Edwards, Officer in Charge of Surrey RCMP. "I want to assure our community that I am committed to seeing this situation resolved safely, peacefully and as soon as possible."

For media inquiries contact:

Cpl. Vanessa Munn

Media Relations Officer

Surrey RCMP Media Relations Unit

Office: 604-599-7776

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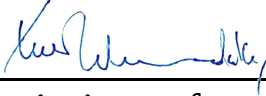
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**Windsor Police Service News Update****Date: Monday, February 14, 2022**

PUBLIC NEWS UPDATE

Police Road Closure Update

The Windsor Police Service would like to appeal to the community and ask for their continued patience, now that the Ambassador Bridge has reopened. Below is an update to our current traffic situation.

Access onto Huron Church Road northbound is for Ambassador Bridge Traffic ONLY at this time. U.S. bound traffic can access Huron Church Road northbound from Highway 3 and the 401, or enter the bridge from the Wyandotte Street West entrance. Southbound traffic coming from the U.S. off the Ambassador is not affected at this time.

All eastbound and westbound arterial roads off of Huron Church Road between the E.C. Row Expressway and the bridge entrance, remain closed. There is potential for traffic delays in the area, therefore we are asking that you plan your route accordingly.

All businesses on Huron Church Road remain open, however alternate routes are required for access. If you require directions please refer to the provided map.

For your safety, we are urging all pedestrians to use the overhead crosswalk at Huron Church Road at Girardot Street as well as the crosswalks at Huron Church Road at Tecumseh Road West, when crossing Huron Church Road. We urge all pedestrians to exercise extra caution when crossing at Huron Church Road at Tecumseh Road West.

Please refrain from calling our E911 Communications Centre for information regarding the reopening of the Ambassador or any related questions. Our phone lines need to remain open for emergencies only.

Police enforcement will continue in the demonstration area, and there will be zero tolerance for any unlawful activity.

We encourage you to follow our social media accounts for the most up to date information. Continuous updates will be posted as they become available.

Twitter: @WindsorPolice

Facebook: Windsor Police Service

 picture of suspect 1

For further information:

Contact the WPS Corporate Communication Unit's Public Information Officer at (519) 255-6700 ext. 4204.

Content posted by:

Constable Talya Natyshak
Corporate Communications Unit
Windsor Police Service - Headquarters
Windsor, Ontario, Canada
Office: (519) 255-6700 ext. 4204

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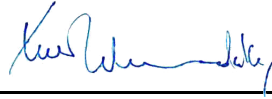
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Ottawa • Analysis

3 weekends, 1 hot tub: Ottawa residents reach protest boiling point

Frustration not just at occupiers, but police and other leaders

[Joanne Chianello](#) • CBC News • Posted: Feb 14, 2022 4:00 AM ET | Last Updated: February 14



Counter-protesters gathered on Saturday in support of COVID-19 vaccines and mandates in Ottawa, rallying against anti-mandate demonstrations that are now in their third week. Another counter-protest blocked trucks on Sunday. (Patrick Doyle/The Canadian Press)

Three weekends and a hot tub — apparently, that's Ottawa's breaking point.

Eighteen days into [a truck protest](#) that's taken over public infrastructure, [polluted downtown air](#) and created an [atmosphere of fear](#) for some downtown residents, it appears the citizens of the nation's capital have had enough.

This weekend, people took to the streets in what were characterized as counter-protests.

On Saturday, about 500 people — including labour unions and those supporting front-line workers — [marched from Lansdowne Park through the Glebe](#), but didn't wade into Centretown for fear of escalating existing tensions.

But the quickly organized [protest that sprang up on Sunday](#) at the intersection of Bank Street and Riverside Drive made its anti-convoy point rather more directly.

A neighbourhood Facebook shoutout from the previous night called for the community to block vehicles from a so-called "blue collar convoy" heading downtown.

It initially attracted about 25 people to the intersection. But by late afternoon, the grassroots group had grown to 1,000 — and tensions often ran high.

The counter-protests stopped trucks, sometimes removing the Canadian flags flapping from the open beds of pickups in exchange for letting drivers go back home.

WATCH | [Counter-protests grow, block convoys:](#)





Frustrated residents launch counter protests

2 months ago | 1:54

Growing frustration with protests over COVID-19 restrictions has sparked counter-protests in cities across Canada, and experts warn there's a potential for escalation. 1:54

At one point, a truck heading north on Bank Street, presumably toward the protest, was quickly swarmed by a group of protesters who flung themselves in front of the moving vehicle.

Clearly concerned for hours that someone would get injured, police quickly separated protesters and the truck, allowing it to head back to where it came from.

But the crowd's pent-up frustration wasn't directed exclusively at the protesters who've been clogging downtown streets, those whose behaviour has [led many businesses to close](#) and [locals to move out](#).

It was also aimed at the authorities, who many believe have been letting it all happen.

Barbecues, bouncy castles

Police have allowed bouncy castles, barbecues, street hockey games and dance parties on Wellington Street.

They appear not to be halting efforts to refuel the trucks parked in the downtown, despite earlier promises that [those doing so would be arrested](#).

Those occupying Ottawa's downtown streets in protest of COVID-19 mandates appear to have little regard for increased penalties and fines for infractions. (Joanne Chianello/CBC)

Not one, but two videos of Ontario Provincial Police officers being friendly with protesters have gone viral on social media.

The first of one allowing protesters [to have photos of themselves taken in the back seat of his car](#); the second of an officer telling a couple he pulled over that he "100 per cent supports" the protesters and has heard nothing but great things about what they're doing in Ottawa.

The latter has led [to an internal investigation](#).

This has fed a growing — if possibly unfair — perception that police are not just giving protesters who are committing offences a pass but actually sympathizing with them.

Perhaps the last straw were the well-publicized photos of two men in a hot tub that they'd brought to the parliamentary precinct Saturday, making fools of the law-abiding people of this city.

Two protesters were lounging in a hot tub at the intersection of O'Connor and Wellington they were somehow able to set up in downtown Ottawa on Saturday. (Patrick Louiseize/CBC)

That anger expressed itself Sunday. Protesters challenged officers about why they weren't being tougher on protesters. One woman at the front of the crowd held a sign that read "Do your job," while nearby, a man screamed the same thing in an officer's face.

The community counter-protesters weren't the only ones to take things into their own hands.

Mayor Jim Watson appears so fed up with the inaction — or perhaps desperate to improve the situation even a little — that he's reversed his previous position [and has agreed to meet with organizers](#), as long as they move the parked vehicles out of residential neighbourhoods and the city-owned baseball stadium parking lot by Wednesday.

What they might agree on should this meeting ever come to pass is hard to imagine.

WATCH | Mayor says he has [a deal for trucks to leave residential neighbourhoods](#):



Ottawa's mayor reaches deal to limit protest as residents push back

2 months ago | 5:56

The mayor of Ottawa has reached a deal with a protest organizer to limit demonstrators to near Parliament Hill, but not before frustrated residents pushed back against the protesters and police were met with criticism over their response. Frustrated residents took matters into their own hands in Ottawa, staging counter-protests to prevent some vehicles from reaching the convoy protest on Parliament Hill. The federal government is also calling the apparent inaction by Ottawa police 'inexplicable'. 5:56

According to a letter sent out by Watson, convoy organizer Tamara Lich has agreed to Watson's demands that all vehicles be moved to Wellington Street, between Elgin Street and the eastern end of Sir John A. Macdonald Parkway.

"The truckers here in Ottawa have always been about peaceful protest. Many of the citizens and businesses in Ottawa have been cheering us on but we are also disturbing others," Lich wrote in a letter to Watson. "That was never our intent."

Then, hours later, Lich tweeted that "the media lies" and that there is "no deal." Hours after that, she replied to a CTV reporter to say she was talking about a federal deal and the local deal is on.

Could become a federal problem

If by some chance Watson's brokered deal somehow comes through, many more vehicles could be crammed at the foot of Parliament Hill, making it a more direct problem for the federal government.

Should the blockade impede parliamentarians from the Hill or other nearby government buildings, the Parliamentary Protective Service folks, overseen by the RCMP, will have to be more directly involved.

Is trying to shove the trucks up onto Wellington more buck-passing, this time by the mayor? Earlier in the day, it was Emergency Preparedness [Minister Bill Blair doing the jurisdiction dodge](#), when he said on CBC's *Rosemary Barton Live* it was "inexplicable" that local police were not enforcing the law.

WATCH | Federal government [considering emergency powers](#):



'We just need the police to do their job,' says minister of emergency preparedness

2 months ago | 10:44

Minister of Emergency Preparedness Bill Blair discusses on *Rosemary Barton Live* the federal government's response to the protests against COVID-19 restrictions that continue to cause major disruptions across the country. 10:44

But whether the convoy moves closer to the seat of federal government, or stays where it is, the federal government will likely have to take more direct action. Blair also said for the first time on Sunday that there are discussions about whether to invoke the Emergencies Act for the first time since it was passed in 1985.

The armed forces could also be requested by the province's attorney general under Part VI of the National Defence Act.

Entitled "Aid of the Civil Power," [this part of the act](#) allows for the military to be called upon to help "in any case in which a riot or disturbance of the peace, beyond the powers of the civil

authorities to suppress, prevent or deal with ... occurs or is, in the opinion of an attorney general, considered as likely to occur."

Maybe the buck will eventually stop with Prime Minister Justin Trudeau and his cabinet. They got together Sunday evening, with meetings of the prime minister and premiers and of the national Liberal caucus [scheduled for Monday](#).

The question remains whether it ever needed to get to this.

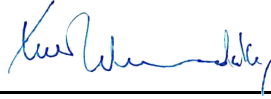
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Government
of Canada

Gouvernement
du Canada

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Federal Government declares a public order emergency under the *Emergencies Act* to end disruptions, blockades and the occupation of the city of Ottawa

From: [Public Safety Canada](https://PublicSafetyCanada.ca)

News release

The Government of Canada's top priority remains to keep people and communities safe, and to protect jobs, trade, and our economy. The federal government is working with provinces and municipalities to get the current situation under control and end the ongoing illegal blockades and occupations taking place across the country.

Today, the Honourable David Lametti, Minister of Justice and Attorney General of Canada, with the support of the Honourable Marco Mendicino, Minister of Public Safety, and the Honourable Bill Blair, President of the Queen's Privy Council in Canada and Minister of Emergency Preparedness, announced the declaration of a public order emergency under the *Emergencies Act*, to end disruptions, border blockades and the occupation of Ottawa's downtown core.

The public order emergency grants the Government the authority to apply the following temporary measures:

- Regulating and prohibiting public assemblies, including blockades, other than lawful advocacy, protest or dissent
- Regulating the use of specified property, including goods to be used with respect to a blockade
- Designating and securing places where blockades are to be prohibited (e.g. borders, approaches to borders, other critical infrastructure)
- Directing specified persons to render essential services to relieve impacts of blockades on Canada's economy
- Authorizing or directing specified financial institutions to render essential services to relieve the impact of blockades, including by regulating and prohibiting the use of property to fund or support the blockades
- Measures with respect to authorizing the Royal Canadian Mounted Police to enforce municipal and provincial laws by means of incorporation by reference
- The imposition of fines or imprisonment for contravening on any of the measures declared under this public order emergency

In order to declare a public order emergency, the *Emergencies Act* requires that there be an emergency that arises from threats to the security of Canada that are so serious as to be a national emergency. Threats to the security of Canada may include the threat or use of acts of serious violence against persons or property for the purpose of achieving a political or ideological

objective. A national emergency is an urgent, temporary and critical situation that seriously endangers the health and safety of Canadians that cannot be effectively dealt with by the provinces or territories, or that seriously threatens the ability of the Government of Canada to preserve the sovereignty, security and territorial integrity of Canada. It must be a situation that cannot be effectively dealt with by any other law of Canada.

When a declaration of a public order emergency is made under the *Emergencies Act*, it allows the federal government to make orders and regulations that it believes are necessary for dealing with the emergency, on reasonable and proportional grounds.

The *Emergencies Act* has stringent, built-in protections which ensure democratic oversight of the use of these powers. Any declaration under the *Emergencies Act* must be laid before both the House of Commons and the Senate within timelines set out in the Act for confirmation. Any steps taken by the Government under the *Emergencies Act* must be consistent with the Canadian Charter of Rights and Freedoms, and must be reasonable and proportional to the risks to the public health and safety of Canadians.

Anyone participating in the blockades is urged to return to their communities peacefully and immediately. The Government's top priority remains to keep people and communities safe, and to protect jobs, trade, and our economy. These blockades must be brought to an end, and the federal government will continue working on every option to end them.

Quotes

“Over the past several weeks, illegal blockades and occupations have disrupted the peace in many communities across Canada, and have hurt our economy. Today’s declaration of a public order emergency is an extraordinary measure that is time-limited, and that will ensure that we restore peace in our communities.”

The Honourable David Lametti, P.C., Q.C., M.P.

Minister of Justice and Attorney General of Canada

“The authorities granted under the Emergencies Act will help end the illegal blockades and uphold the law. They are targeted, measured, temporary - and proportionate to the urgent circumstances facing our country. These authorities are part of a responsible & scalable approach, and are entirely consistent with the Charter. We will continue to support law enforcement at all levels to secure our borders and critical infrastructure, safeguard our economy and protect the health and safety of Canadians.”

The Honourable Marco Mendicino

Minister of Public Safety

"This is a critical moment for our country. The Government of Canada is taking these extraordinary steps to support law enforcement and swiftly end the unlawful blockades that are threatening the safety of our communities, our infrastructure, and our borders."

The Honourable Bill Blair

President of the Queen's Privy Council for Canada and
Minister of Emergency Preparedness

Quick facts

- There are four types of national emergencies that can be declared under the Emergencies Act: a public welfare emergency, a public order emergency, an international emergency, or a war emergency.
- A national emergency is an urgent, temporary and critical situation that seriously endangers the health and safety of Canadians that cannot be effectively dealt with by the provinces or territories, or that seriously threatens the ability of the Government of Canada to preserve the sovereignty, security and territorial integrity of Canada. It must be a situation that cannot be effectively dealt with by any other law of Canada.
- A public order emergency may be declared where an emergency arises from threats to the security of Canada that are so serious as to be a national emergency. Threats

to the security of Canada may include the threat or use of acts of serious violence against persons or property for the purpose of achieving a political or ideological objective.

- The Act can grant the federal government additional powers, compared to what is usually available outside of a time of emergency. However, the Act contains provisions limiting which orders or regulations the federal government can make.
- The Emergencies Act requires consultation with provinces and territories before a public order emergency can be declared, unless the provinces and territories cannot be adequately consulted without unduly jeopardizing the effectiveness of the proposed action. On the basis of those consultations, and when the Government concludes that the situation cannot be effectively dealt with under any other federal, provincial or territorial law, the Government may make a declaration of a public order emergency.
- The measures introduced by the Government of Canada demonstrate respect for constitutionally protected rights and freedoms, including the right of citizens to enter Canada and the right to life, liberty and security of person, as well as Canada's obligations under international law.
- Once the Government makes a formal declaration of a public order emergency, the declaration is effective for up to 30 days. However, the Houses of Parliament must confirm this declaration, and it has the power to revoke it at any time, as does the Government.

- If the federal government determines that it is necessary to extend the Declaration, this continuation must be confirmed by the Houses of Parliament. The provinces and territories must also be consulted again before a Declaration may be extended.
- A foreign national must not enter Canada with the intent to participate in or facilitate a prohibited assembly. Foreign nationals who seek to enter Canada for these purposes can be denied boarding prior to departure, and denied entry at a port of entry. There are limited exemptions to the prohibition on entry, for specified classes of foreign nationals.

Related products

- [Backgrounder: Canada's Emergencies Act](#)

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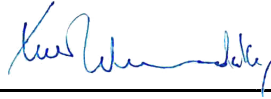
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This is Exhibit “NNNN” mentioned to
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Rebecca Coleman

Sworn before me this 4th day of
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A Commissioner for taking affidavits
Nur Muhammed-Ally, Counsel

Prime Minister Justin Trudeau invokes Emergencies Act to try to bring an end to the blockades

MARIEKE WALSH >

ROBERT FIFE > OTTAWA BUREAU CHIEF

JANICE DICKSON >

OTTAWA

PUBLISHED FEBRUARY 14, 2022

UPDATED FEBRUARY 15, 2022

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restrictions that have blockaded Ottawa and border crossings.

Mr. Trudeau called the unprecedented move on Monday an act of “last resort,” made in an attempt to end the intractable 18-day demonstration in downtown Ottawa and roadblocks at border crossings in Alberta, Manitoba and British Columbia. He said the emergency powers would also ensure authorities can keep the Ambassador Bridge, which was just reopened, clear of protesters.

The Prime Minister said the emergency orders, which are in effect immediately, will be “time limited, geographically targeted, as well as reasonable and proportionate to the threats they are meant to address.”

“These blockades are illegal, and if you’re still participating, the time to go home is now,” Mr. Trudeau said.

What is Canada’s federal Emergencies Act? A summary of the law’s powers and uses

Emergencies Act will expand powers of Canadian banks to freeze accounts, halt funds

By invoking the state of emergency, the Prime Minister directly inserted the federal government into tackling the blockades that are damaging Canada’s economy and international reputation. Ottawa is now ordering private companies to do its bidding. The Prime Minister is also risking further divisions with the many premiers who said they opposed the federal declaration and warned it is not proportionate.

Under the law, the federal government will strengthen police powers to impose fines and imprison people; compel tow-truck companies to help clear blockades; allow banks to freeze the personal and corporate accounts of individual protesters without a court order; and subject crowdfunding companies to anti-money laundering and terrorist financing rules.

“We are today serving notice: If your truck is being used in these illegal blockades, your corporate accounts will be frozen, the insurance on your vehicle will be suspended,” Finance Minister Chrystia Freeland said at the news conference with Mr. Trudeau. “Send your semi-trailers home. The Canadian economy needs them to be doing legitimate work, not to be illegally making us all poorer.”



“This will help mitigate the risk that these platforms receive illicit funds, increase the quality and quantity of intelligence received by FINTRAC, and make more information available to support investigations by law enforcement into these illegal blockades,” Ms. Freeland said.

Through the Emergencies Act, the government declared a public order emergency, which Justice Minister David Lametti said cabinet hopes to revoke earlier than the 30 day time-frame granted under the law. Mr. Lametti said he believes the government has met the conditions required for the declaration, which include that the crisis “seriously endangers” the safety of Canadians or threatens Canada’s security.

The government has to bring the emergency declaration to the House of Commons for a vote within seven days. The Senate is also required to hold a vote on it. If invoking the act is not approved, the declaration is rescinded.

The act requires the creation of a Parliamentary oversight committee, and mandates a public inquiry report to the House of Commons on the emergency declaration within a year of its termination.

The act also requires the prime minister to consult with all provincial and territorial premiers before issuing a declaration. Mr. Trudeau met virtually with premiers on Monday morning after briefing his caucus. While Ontario Premier Doug Ford supported the decision, premiers from Manitoba

are necessary to end them.

Mr. Trudeau said police who can control demonstrations in their jurisdiction “will not have to use those additional tools” and that communities not experiencing significant illegal protests are unlikely to see any impact.

Interim Conservative Leader Candice Bergen said the Conservatives will wait to see the details before deciding whether to support the emergency orders.

“Conservatives want to see an end to the blockades,” she said. “We want to see them ended peacefully and quickly, in a way that Canadians feel that they’ve been listened to,” she said. “We are concerned that the actions of the Prime Minister will not have that effect, and in fact will have the opposite effect.”

NDP Leader Jagmeet Singh said his party supports Mr. Trudeau’s action, but the timing is an “example of the failure of his leadership.”

Before the government announcement, protest organizers and former Newfoundland and Labrador premier Brian Peckford dismissed the federal plan. Mr. Peckford is part of a lawsuit challenging the federal vaccine mandate for international travellers. He likened the use of the Emergencies Act to “killing a fly with a sledgehammer.”

“We are going to hold the line,” Mr. Peckford said.

Protests in downtown Ottawa are usually quieter during the week, but after the Prime Minister’s news conference, demonstrators began sounding their horns and blasting music.

Tyler Armstrong, a 25-year-old truck driver from Hamilton who has had his truck cab parked on Wellington Street in Ottawa since the blockade started at the end of January, called the emergency declaration “a little bit ridiculous,” saying the protesters are lawful and peaceful.

“I’m going to stay here until every mandate Canada-wide is lifted,” he said, adding that he has no fear of arrest because police have been friendly.

“This law creates a high and clear standard for good reason: the act allows government to bypass ordinary democratic processes. This standard has not been met,” the group said.

Leah West, an assistant professor of international affairs at Carleton University and national security expert, said on Twitter she has “serious doubts” the conditions have been met. “Can it truly be said the security of Canada is threatened by largely non-violent protests? Certainly, our sovereignty and territorial integrity are not at risk.”

But Errol Mendes, a law professor at the University of Ottawa, said the protests are beginning to look more like an insurrection and are becoming a national security threat. He said Canada suffered significant economic damage from the blockade at the Ambassador Bridge

“We need a national response,” he said.

Public Safety Minister Marco Mendicino said many of the leaders of the blockades are extremists, who are willing to resort to violence.

He pointed to the seizure of weapons in Coutts, Alta., describing the protest leaders as a “hardened group, driven by extremist ideology to overthrow the government.”

He would not say if there is any evidence that protesters in Ottawa have guns but he said the government is concerned about a truckload of 2,000 firearms stolen from Peterborough, Ont.

Mr. Mendicino said the emergency powers should help end the more than two weeks of unrest in Ottawa, noting the RCMP and Ontario Provincial Police are “assuming shared control and command over the operation in Ottawa.”

Mr. Trudeau said “the measure of success” of the emergency orders will be determined by the reliability of Canada’s supply chains and the return to normal life.

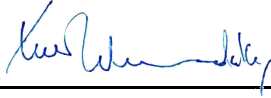
With a report from Bill Curry

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A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

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FEDERAL POLITICS

Justin Trudeau invokes Emergencies Act to stop convoy protests

The federal government has declared a public order emergency that will give police and financial institutions special powers to crack down on the “Freedom Convoy” protests.

By **Tonda MacCharles** Ottawa Bureau

Alex Ballingall Ottawa Bureau

Mon., Feb. 14, 2022 | ⌚ 7 min. read

🕒 Article was updated Feb. 15, 2022

JOIN THE CONVERSATION (471)

OTTAWA—Border blockades and a convoy of trucks and anti-government protesters choking off the streets of Canada’s capital city prompted Prime Minister Justin Trudeau to finally do Monday what he had avoided during two years of a global pandemic: declare a national state of emergency.

Trudeau took the unprecedented step of invoking the federal [Emergencies Act](#) to declare a “public order emergency” that will grant police and financial institutions extraordinary powers to confront the convoy protesters.

This includes powers to create no-go zones around critical infrastructure such as border crossings and downtown Ottawa, halt public assemblies that “breach the peace” in those red zones, commandeer tow trucks in order to remove big rigs blocking streets, and freeze or suspend protesters’ bank accounts and vehicle insurance coverage.

“Despite their best efforts, it is now clear that there are serious challenges to law enforcement’s ability to effectively enforce the law,” Trudeau said as civil libertarians warned of an overreach by his government.

Under the new measures, the Royal Canadian Mounted Police can be empowered to act as local and provincial police. Anyone violating emergency orders could face fines of up to \$5,000 and up to five years in jail.

The declaration is effective immediately, but must be tabled in Parliament within seven days, and will be in place for 30 days unless the government stops it early or Parliament votes to revoke it, as outlined in the Emergencies Act.

A senior federal official said the government expects the powers to be used in “the next hours and days.”

The prime minister stressed the emergency declaration does not mean the government is calling in the military to deal with protesters, but will instead empower police to clear out illegal blockades he said are harming “regular Canadians” by choking off trade, shuttering businesses and making people feel unsafe.

Describing the decision to assume the powers as a “last resort,” Trudeau said it was nonetheless necessary because the situation calls for special measures — such as those designed to cut off funding to the protests — that provinces couldn’t enact on their own.

Trudeau said his conversations with world leaders on the Ukraine crisis revealed “democracies around the world are concerned” by the outbreak of protests in Canada, including countries that did well during the pandemic but are also seeing backlashes against public health measures.

He said leaders see “frustration by people who are tired of this pandemic and the impact of social media and illicit funding of concerted activities designed to destabilize a country that has the highest vaccination rate of many of our peer countries.”

Senior government sources acknowledged the pressure that built over the past week, especially when the Ambassador Bridge was closed by protesters and several Biden administration officials made interventions with their counterparts, which one described as “definitely something that was significant.”

“It sort of allowed us to ... really understand and appreciate that this isn’t just a domestic issue, that it is having an impact on our international relationships,” said the source, who spoke on condition of anonymity to discuss government matters.

Alex Ballingall  @aballinga · Feb 14, 2022 

Replying to @aballinga

Trudeau says they're not calling in the military, not limiting freedom of speech or peaceful assembly. "We are reinforcing the principles, values and institutions that keep all Canadians free," he says.

Alex Ballingall 

@aballinga

Trudeau acknowledges the Emergencies Act has never been used before. He says it should be used "sparingly, and as a last resort."

He says the situation calls for it because "responsible

The measures were unveiled on the same day the RCMP seized three trailers and a cache of firearms, ammunition and body armour near a border protest in Coutts, Alta., where traffic into Montana has been halted or slowed for more than two weeks — a development another senior government official admitted is worrying, along with troubling news that two elite Canadian Forces' soldiers and a former member are under investigation for participating in the Ottawa convoy.

Organizers of the so-called “Freedom Convoy” responded to the emergency declaration with the same defiance they’ve projected for almost three weeks, as local police and politicians urged them to lift their occupation of the capital’s downtown core.

Chris Barber, a trucker from Saskatchewan and one of the protest spokespeople, told the Star he thinks Trudeau is bent on “tyranny.”

Barber said the use of the Emergencies Act is already galvanizing more protesters to come to Ottawa in buses from Western Canada, and that police should not enforce new powers on behalf of a government that has “gone rogue on its people.”

Asked if the powers to freeze bank accounts and suspend the truck insurance of protesters would intimidate protesters, Barber was dismissive.

“He wants to mess with the wrong group of people,” Barber said of Trudeau.

“All he’s doing is throwing a tantrum. The only thing I want to do is put a soother in that guy’s mouth.”

Tonda MacCharles  @TondaMacC · Feb 14, 2022 

Replying to @TondaMacC

Freeland: directs Cdn financial institutions to review relationships with anyone suspected involved with illegal blockades, report to RCMP or CSIS.

"This is about following the money. This is about stopping the financing of these illegal blockades."

Tonda MacCharles 

@TondaMacC

Freeland warns truckers that their trucks can be seized, their corporate accounts frozen, vehicle insurance will be

Trudeau faced immediate pushback from the federal Conservatives, the Bloc Québécois, and conservative premiers in Alberta, Saskatchewan, Manitoba and Quebec, but support from the federal New Democrats and Ontario Premier Doug Ford.

NDP Leader Jagmeet Singh said he is open to backing the government, but promised to “provide scrutiny” and flag concerns “if there’s any inappropriate use of these measures.”

At Queen’s Park, Ford said it’s crucial to “stabilize our businesses and trade around the world, as the world is watching us right now, wondering if it’s a stable environment to open up businesses and expand businesses.

“At the end of the day, all the premiers agree with one thing: We cannot have people creating chaos at our borders, interrupting trade with the rest of the world. It won’t be tolerated and we’ll make sure we take care of it,” Ford said.

Deputy Prime Minister and Finance Minister Chrystia Freeland said the blockades caused “serious harm to our economy, to our democratic institutions, and to Canada’s international standing” as a reliable trading partner and a place to invest.

“This is unacceptable,” she said. “It cannot stand and it will not stand.”

RCMP Alberta 

@RCMPAlberta



Alberta RCMP make arrests at Coutts Border Blockade:

Freeland said the emergency declaration will cut off the flow of money from Canada and abroad to “Freedom Convoy” organizers and demonstrators across the country. As of Monday, the government will require crowdfunding sites, such as those that have [raised millions](#) of dollars for the protesters in recent weeks, to report “large and suspicious transactions” to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC).

The government will also issue an “immediate” order to authorize Canadian banks and other financial institutions to freeze or suspend accounts suspected of supporting illegal activities without a court order, she said.

“This is about stopping the financing of these illegal blockades,” Freeland said. “If your truck is being used ... your corporate accounts will be frozen. The insurance on your vehicle will be suspended.”

Freeland said the economic impact of the blockades has been massive, with daily trade over the now-cleared Ambassador Bridge worth \$390 million, while ongoing blockades in Emerson, Man., and Coutts, Alta., threaten a total of \$121 million in trade per day.

Chrystia Freeland  @cafreeland
Canada government official

This is about following the money. This is about stopping the financing of these illegal blockades. We are today serving notice: if your truck is being used in these protests, your corporate accounts will be frozen.

Public Safety Minister Marco Mendicino said the government's intelligence agencies believe a "significant percentage of those contributions are coming from abroad, they're foreign contributions."

Security expert Wesley Wark said trying to regulate foreign-based crowdfunding platforms under FINTRAC may turn out to be little more than a "nice symbolic gesture." The agency oversees transfers of money over \$10,000, and Wark said it already has difficulty tracking money-laundering and terrorist financing.

But Wark said freezing funds in protesters' bank accounts is a tool to dissuade blockade participants that "really does hit their livelihoods in a way that could be very effective."

While the declaration of a federal emergency may anger those inclined to support the convoy, Wark said he believes government inaction would have "thrown gas on the fire and emboldened these protesters."

The Canadian Association of Civil Liberties condemned the use of the Emergencies Act as unnecessary. In a Twitter post, it said the convoy protests do not meet the threshold spelled out in the law, which states it is meant for a situation that "seriously threatens" the government's ability to "preserve the sovereignty, security and territorial integrity of Canada," and when the situation "cannot be effectively dealt with under any other law of Canada."

"Emergency legislation should not be normalized. It threatens our democracy and our civil liberties," the CCLA said.

Canadian Civil Liberties Association 

@cancivlib



The federal government has not met the threshold necessary to invoke the Emergencies Act. This law creates a high and clear standard for good reason: the Act allows government to bypass ordinary democratic processes. This standard has not been met. 1/3

7:36 PM · Feb 14, 2022



[Read the full conversation on Twitter](#)

Since the convoy arrived in Ottawa more than two weeks ago, residents and local politicians have decried how the city has been placed under "siege," with days of constant honking from hundreds of parked trucks, and reports of harassment associated with protesters in the downtown. Police have said they are investigating alleged hate crimes, assaults, property damage and an attempted arson in the lobby of an apartment building. City officials have received death threats, including the police chief, while images of Nazi swastikas and Confederate flags that emerged during the protest's first week sparked widespread condemnation and concern.

In downtown Ottawa on Monday, dozens of semis packed onto Wellington Street in front of Parliament Hill, after the city's mayor urged protesters to move their trucks from residential streets closer to the ostensible target of their outrage: politicians responsible for pandemic health measures in the House of Commons and Prime Minister's Office.

In the streets around Parliament Hill, a new wave of trucks arrived, and took up spaces left vacant by other protesters Sunday after a surge of demonstrators descended on the capital for a third straight weekend.

Eddie Humphrey poured fuel from a yellow jerry can into a semitruck parked in front of Parliament Hill. Asked about the expected use of the Emergencies Act, Humphrey said he would sit cross-legged on the pavement and put his hands up.

“We’re not here for a fight. It’s turned into a celebration of healing and love and that,” said Humphrey, who came to join the protests last week from Manitoba, where he works for the provincial hydro agency.

“These guys rolled in with their voices, their air horns, and gave us a voice,” he said, “and I believe things are changing because of this.”

With files from Kris Rushowy



Tonda MacCharles is an Ottawa-based reporter covering federal politics for the Star. Follow her on Twitter: [@tondamacc](#)



Alex Ballingall is an Ottawa-based reporter covering federal politics for the Star. Follow him on Twitter: [@aballinga](#)

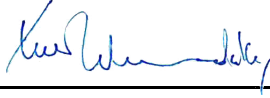
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Canada invokes the *Emergencies Act* to limit funding of illegal blockades and restore public order

From: Department of Finance Canada

News release

February 15, 2022 - Ottawa, Ontario - Department of Finance Canada

On February 14, 2022, the Government of Canada declared a public order emergency.

The *Emergency Economic Measures Order* implements the following measures, which come into force immediately and will be in effect for 30 days:

First, the order extends the scope of Canada's anti-money laundering and anti-terrorist financing rules to cover crowdfunding platforms and the payment processors they use. This change covers all forms of transactions, including digital assets such as cryptocurrencies.

As of this order, crowdfunding platforms, and payment service providers that are in possession or control of any funds that are owned, held or controlled by or on behalf of anyone involved in

the illegal blockades are required to register with and report suspicious or large value transactions to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC).

Second, the order immediately directs Canadian banks, property and casualty insurance companies, and other financial service providers to temporarily cease providing financial services where the institution suspects that an account – either personal or corporate – is being used to further the illegal blockades. This applies to all funds, including those held in a deposit, chequing, savings, or trading account, and to cryptocurrency wallets, lending products, investment assets, and insurance policies for vehicles used in the illegal blockades.

Third, the government is directing Canadian financial institutions to review their relationships with anyone involved in the illegal blockades and report the assets and related transactions of those involved to the RCMP or CSIS.

Fourth, the order provides federal, provincial, and territorial government institutions with new authority to share relevant information with banks and other financial services providers, if the information will help put a stop to the funding of illegal blockades and illegal activities.

As of now, Canadian financial service providers will be able to immediately freeze or suspend an account of an individual or business affiliated with the blockades without a court order.

These new requirements and authorities will help mitigate the risk that Canadian financial institutions and crowdfunding platforms transact illicit funds, increase the quality and quantity of

intelligence received by FINTRAC, and make more information available to support investigations by law enforcement into the illegal blockades.

Quotes

“Around the world, liberal democracies have been facing serious and sustained threats. We have learned over the past two and a half weeks that Canada is not immune to such threats. These illegal blockades are doing great damage to our economy, to our democratic institutions, and to Canada’s international standing. We will not allow Canada’s privileged trading relationship with the United States to be compromised. We are today serving notice: if your truck is being used in these protests, your corporate accounts will be frozen. The insurance on your vehicle will be suspended. Send your semi-trailers home.”

*- The Honourable Chrystia Freeland, Deputy Prime Minister
and Minister of Finance*

Quick facts

- For over two and a half weeks, the occupation of Ottawa’s downtown core has forced businesses to close, restricted the movement of essential workers and goods, and threatened the health and safety of residents.

- Since the blockades began at the Ambassador Bridge, over \$390 million in trade each day with Canada's most important trading partner, the United States, has been affected. This bridge supports 30 percent of all trade by road between Canada and the United States.
- The blockades in Coutts, Alberta, and Emerson, Manitoba, have affected approximately \$48 million and \$73 million in trade each day, respectively.
- Under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA), financial institutions and other entities, such as banks, credit unions, and money services businesses, are subject to due diligence and reporting requirements aimed at identifying individuals involved in illicit finance activities.

Related products

- [Government of Canada declaration of a public order emergency](#).
- [Emergency Economic Measures Order: SOR/2022-22](#)

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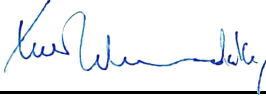
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Nur Muhammed-Ally, Counsel

February 15, 2022
Ottawa, Ontario

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Second, the order immediately directs Canadian banks, property and casualty insurance companies, and other financial service providers to temporarily cease providing financial services where the institution suspects that an account – either personal or corporate – is being used to further the illegal blockades. This applies to all funds, including those held in a deposit, chequing, savings, or trading account, and to cryptocurrency wallets, lending products, investment assets, and insurance policies for vehicles used in the illegal blockades.

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Fourth, the order provides federal, provincial, and territorial government institutions with new authority to share relevant information with banks and other financial services providers, if the information will help put a stop to the funding of illegal blockades and illegal activities.

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Quote

"Around the world, liberal democracies have been facing serious and sustained threats. We have learned over the past two and a half weeks that Canada is not immune to such threats. These illegal blockades are doing great damage to our economy, to our democratic institutions, and to Canada's international standing. We will not allow Canada's privileged trading relationship with the United States to be compromised. We are today serving notice: if your truck is being used in these protests, your corporate accounts will be frozen. The insurance on your vehicle will be suspended. Send your semi-trailers home."

— The Honourable Chrystia Freeland, Deputy Prime Minister and Minister of Finance

Quick Facts

- For over two and a half weeks, the occupation of Ottawa's downtown core has forced businesses to close, restricted the movement of essential workers and goods, and threatened the health and safety of residents.
- Since the blockades began at the Ambassador Bridge, over \$390 million in trade each day with Canada's most important trading partner, the United States, has been affected. This bridge supports 30 per cent of all trade by road between Canada and the United States.
- The blockades in Coutts, Alberta, and Emerson, Manitoba, have affected approximately \$48 million and \$73 million in trade each day, respectively.
- Under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA), financial institutions and other entities,

such as banks, credit unions, and money services businesses, are subject to due diligence and reporting requirements aimed at identifying individuals involved in illicit finance activities.

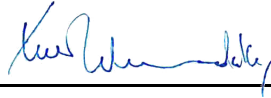
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- Government of Canada declaration of a public order emergency (<https://www.canada.ca/en/services/policing/emergencies/public-order.html>)
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Nur Muhammed-Ally, Counsel



[Royal Canadian Mounted Police \(https://www.rcmp-grc.gc.ca\)](https://www.rcmp-grc.gc.ca)

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Arrests at the Pacific Highway Border Crossing

Surrey

2022-02-15 11:00 PST

File # 2022-21713

Surrey RCMP is providing an update on the current situation at the Pacific Highway Border Crossing.

On February 14, 2022, starting at approximately 8:30 pm, police engaged protesters and 12 people were arrested. This brings the total arrests to 16, including those taken into custody on February 13.

Subsequent investigations are underway into unlawful activity that is alleged to have occurred on Saturday February 12.

In addition, multiple vehicles that were blocking 176 Street were removed from the area and the road has re-opened. Vehicles and pedestrians are now able to access the border crossing.

Surrey RCMP officers were assisted by RCMP E Division, the Lower Mainland Integrated Tactical Troop and surrounding area Detachments.

“Surrey RCMP along with policing partners have used a measured approach throughout this situation to ensure the safety of the police and the public, including young children who were brought to the area by protestors,” says Assistant Commissioner Brian Edwards, Officer in Charge of the Surrey RCMP. “Local residents and businesses in the area have been patient and supportive as we’ve worked towards a resolution, with public safety always remaining at the forefront.”

The public can expect to see a continued police presence in the area in the days ahead, with ongoing assessments of the situation.

Released by

Cpl. Vanessa Munn

Media Relations Officer

Surrey RCMP

www.surreyrcmp.ca (<http://www.surreyrcmp.ca>)

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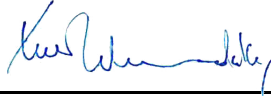
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Ottawa police Chief Peter Sloly resigns amid 'freedom convoy' blockade

By [Rachel Gilmore](#), [Alex Boutilier](#), [Ahmar Khan](#), [Craig Lord](#) & [Amanda Connolly](#) • Global News

Posted February 15, 2022 12:52 pm ▼



WATCH: Ottawa Police Chief Peter Sloly resigns amid 'freedom convoy' blockade – Feb 15, 2022



-A A+

Ottawa Police Service Chief [Peter Sloly](#) has resigned amid the so-called [“freedom convoy”](#) protests that have taken over much of downtown Ottawa for weeks.

Sloly’s resignation comes as the Ottawa police response to the trucker convoy’s ongoing demonstrations in the downtown core has been heavily criticized for a perceived lack of enforcement under Sloly’s leadership.

“Since the onset of this demonstration, I have done everything possible to keep this city safe and put an end to this unprecedented and unforeseeable crisis,” [Sloly said in a statement on Tuesday](#). “We have acquired new resources and enforcement tools, and stood up the new Integrated Command Centre. I am confident the Ottawa Police Service is now better positioned to end this occupation.”

Over the course of 19 days, demonstrators have set up hot tubs, organized concerts and built DJ stages for late night parties — all with little to no consequences.

STORY CONTINUES BELOW ADVERTISEMENT

Calling the protests “unprecedented,” Sloly had repeatedly said the service requires additional officers to end the demonstration.

In the first week of the encampment, Sloly said, there “might not be a policing solution” to the protests and called for more support from provincial and

federal sources. The federal government has since moved to activate emergency powers to end blockades across the province and Canada.

READ MORE: [Watson's backdoor dealing with 'freedom convoy' is harmful, say some Ottawa residents](#)

Sloly addressed his departure through a letter posted to his [Twitter account](#).

"It is with a heavy heart I am announcing I have stepped down as Chief of Ottawa Police Service."

The departing chief commented on his ability to bring change, attempting to change the culture in the police service and focusing on diversity. Sloly said that since the demonstrations began, he remained focused on keeping Ottawans safe.

"I have done everything possible to keep this city safe and put an end to this unprecedented and unforeseeable crisis."

He noted that as he is departing the city has also received new resources and enforcement measures, and along with the new Integrated Command Centre, is in a position to end the occupation.

STORY CONTINUES BELOW ADVERTISEMENT

Sloly joined the force in October 2019 following his time with the Toronto Police Service where he was deputy chief for seven years. He served with the Toronto Police Service for a total of 27 years and was on the shortlist to replace Bill Blair as the head of that force, but lost the spot to Mark Saunders.

2:10

Some trucks move, others stay after Ottawa mayor's d...

Some trucks move, others stay after Ottawa mayor's deadline for protesters – Feb 14, 2022

In response to calls to divert municipal funding from the police to social services, Sloly had previously acknowledged the need for “systemic change” in policing. Sloly resigned and left the Toronto Police Service in 2016 prior to the end of his contract.

He took over in Ottawa for outgoing chief Charles Bordeleau after three years away from policing.

“He’s a fundamentally decent man faced with a very difficult job and frankly I’m very saddened by this turn of events,” said Bill Blair, who served as Sloly’s former boss in Toronto.

STORY CONTINUES BELOW ADVERTISEMENT

Blair, now a Liberal member of parliament, did not comment on why Sloly resigned and said that he had spoken with Ottawa Mayor Jim Watson.

“There’s still a very significant job to be done.”

Marco Mendicino, Minister of Public Safety and Emergency Preparedness acknowledged Chief Sloly’s resignation on Monday afternoon.

“That wasn’t up to the feds,” he said. “The feds are focused on ensuring Ottawa police, OPP and the RCMP have all of the tools that are necessary to restore public order in Ottawa.”

Mayor Jim Watson said he accepted Sloly’s resignation and thanked the outgoing chief for his service in a statement released to the media just as the Ottawa Police Services Board meeting was getting underway Tuesday afternoon.

“Unfortunately, it had become clear that many members of the Police Board, City Council and the general public were not satisfied with the response of the police in bringing the occupation to an end,” Watson said.

He went on to affirm his “full confidence” in the OPS and in Bell as the interim chief.

Watson recently set up a “backchannel” deal with convoy organizers to relocate trucks from Ottawa’s “residential” neighbourhoods to the demonstration’s main footprint on Wellington Street — a move that has drawn criticism from some Ottawa residents and city councillors.

STORY CONTINUES BELOW ADVERTISEMENT

2:31

Trucker protests: Trucks get police escort onto Capital ...

Trucker protests: Trucks get police escort onto Capital Hill – Feb 14, 2022

Ottawa Police Board Services Board chair Diane Deans released a statement thanking Sloly for his service and addressing his resignation.

TRENDING STORIES

The federal carbon tax is set to rise April 1. How will that affect gas prices?

Jim Carrey 'sickened' by Hollywood response to Will Smith, Chris Rock slap

“Today, the Ottawa Police Services Board and Chief Peter Sloly reached a mutually agreed upon separation. Effective immediately Chief Sloly is no longer employed with the Ottawa Police Service,” she wrote in a press release.

Deans noted that Deputy Chief Steve Bell will be the interim chief until further notice and they will be working to appoint a new chief soon. Bell, who spoke at the police board meeting on Tuesday afternoon, said he aimed “to restore law and order in the city of Ottawa” and is prepared to end the occupation.

Bell said that he hoped to work with RCMP and Ontario Provincial Police to bring an end to the occupation while consulting the neighbourhoods affected, but that they would also would be working with demonstrations, too.

STORY CONTINUES BELOW ADVERTISEMENT

“The support that we’ve gotten from the RCMP and OPP that has been continually building over the last week has been invaluable to us to get to a position where we’re at a turning point for this demonstration,” said Bell.

He added that RCMP and OPP have continued to add more resources along with expertise. Bell said they've received some of the fellow forces' "best" and that the increased numbers makes it easier to move forward with plans.

During the meeting, the board said the police resources have totalled \$14.1 million in costs, which does not include the RCMP if they do provide invoices. The average cost per day is \$785,000 and could rise with more officers joining, according to the board.

Ottawa councillors weigh-in on Sloly resignation

Catherine McKenney, who is the councillor for Somerset Ward, one of areas where the demonstrations are happening, said they were not surprised by Sloly's resignation.

STORY CONTINUES BELOW ADVERTISEMENT

"There was no doubt a paralysis on behalf of our local police and the leadership in responding to what is becoming an ongoing, almost slow motion crisis," McKenney said.

McKenney pointed out that police had said they were enforcing some of the injunctions against honking, or were limiting fuel from entering, but videos showed demonstrators still continued doing so.

“Where there’s a loss in confidence and that becomes even more tenuous... that can be create more volatility,” McKenney said.

But, while McKenney is disappointed in Sloly’s handling of the situation, they don’t feel he alone should bear the blunt of the blame. They added that all levels of government have failed Ottawans.

“I think the last 18, 19 days will be a legacy for many, many people in this city, especially those of us who are elected to represent people to make decisions,” they said.

0:56

Ottawa City Councillor Catherine McKenney not surpri...

Ottawa City Councillor Catherine McKenney not surprised by Sloly resignation – Feb 15, 2022

While Sloly is the first authority figure to resign from his post, Shawn Menard, councillor for Capital Ward, noted that while Ottawa’s first Black police chief bears some responsibility, he is being made a scapegoat for failures above him, too.

STORY CONTINUES BELOW ADVERTISEMENT

“This shouldn’t just fall at Chief Sloly’s feet at all,” he said. “Up until yesterday, I heard nothing but praise for the police response, police chief, from the mayor, police board chair Diane Deans and the city manager,” he said.

Menard added that he thinks Sloly did the right thing in stepping away.

“When the public loses confidence to this degree, I think there needs to be measures to restore trust. And so in this case, I think he slowly did the right thing in this instance, given the ongoing crisis,” he said.

While Sloly’s tenure in Ottawa is a short-lived one, McKenney thinks these 19 days will be a part of his legacy.

“I firmly believe that many, many people abandoned the residents of Centretown, that it took far too long for many to recognize the impact, the danger and the volatility to a very dense residential neighbourhood.”

With Sloly now gone, McKenney thinks any talk of negotiations needs to end and new leader of the Ottawa Police Service needs to take direct action to keep locals safe.

“I want the residential areas cleared out immediately. I don’t want them to go somewhere else. I want them out of the city. I want enforcement to happen. I want it to happen swiftly and with the full force that they have available to them,” McKenney said.

STORY CONTINUES BELOW ADVERTISEMENT

What options do Ottawans have to raise concerns?

Frustration among residents of the nation's capital has boiled over into anger over the past two weeks, as the convoy remains encamped across the city and police have opened more than 120 criminal investigations into alleged mischief, harassment, threats and assaults by members of the convoy against local citizens.

And while the Ottawa Police Services Board has oversight authority for the funding and operations of the Ottawa police, there is also another avenue for frustrated residents looking to put their concerns about police on the official record.

The Office of the Independent Police Review Director is the Ontario directorate officially tasked with probing public complaints into the conduct of police services operating within the province. And while their mandate includes complaints about specific officers, it also includes the scope to probe "systemic" issues — including those amounting to "neglect of duty."

STORY CONTINUES BELOW ADVERTISEMENT

“The OIPRD accepts complaints about the conduct of a police officer or the policies and services of a police service,” explained a spokesperson for the office in an email to Global News.

“Conduct complaints are about how a police officer behaves. Policies of a police service are the rules and standards that guide an officer in delivering police services. Services are how effectively and efficiently a particular police service performs its duties.”

The OIPRD would not say whether it has received any complaints about either Sloly, any individual officers, or the handling of the convoy blockade by the Ottawa Police Service as a whole.

But anyone is free to file a complaint online and under the Ontario Police Service Act, the OIPRD has the power to conduct systemic reviews in cases where complaints identify a broader issue.

“A systemic review goes beyond the immediate issues raised by a given complaint and looks at the underlying causes to determine whether an organization’s practices comply with its underlying legal and policy framework and, more importantly, whether that framework can be improved to prevent such issues from arising in the future,” the OIPRD said.

“A systemic review is generally not about individual officers. Its purpose is not to assign individual fault, but to determine whether systemic failings have occurred, to make recommendations to address those failings and to help restore and enhance public confidence in police and policing.”

STORY CONTINUES BELOW ADVERTISEMENT

And trust, according to many local residents airing complaints online, has indeed been broken.

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Freedom Convoy

freedom convoy 2022

Peter Sloly

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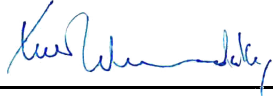
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Alberta RCMP make arrests at Coutts Border Blockade – Update 3

📅 February 15, 2022

News release

📍 Coutts, Alberta

The following individuals have been charged from recent incidents at the Coutts border protest:

A 44-year-old male, a 48-year-old male, a 39-year-old male, a 40-year-old male have all been charged with:

- Conspiracy to Commit Murder
- Possession of a Weapon for Dangerous Purpose
- Mischief Over \$5,000

The 44-year-old male has additionally been charged with:

- Uttering Threats

A 22-year-old female, a 62-year-old female, another 62-year-old male, a 23-year-old male, a 39-year-old male, a 22-year-old male, another 22-year-old male and an 18-year-old male have all been charged with:

- Possession of a Weapon for Dangerous Purpose
- Mischief Over \$5,000

A 39-year-old female has been charged with:

- Mischief Over \$5,000

–30–

Contact information

Alberta RCMP Media Relations
780-509-3970

Related news

[Alberta RCMP make arrests at Coutts Border Blockade – Update 2 \(https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-update-the-coutts-border-protests\)](https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-update-the-coutts-border-protests)

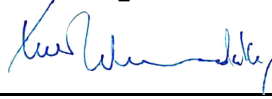
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Windsor Police Service News Update

Date: Tuesday, February 15, 2022

PUBLIC NEWS UPDATE

Police Enforcement Results Since the Onset of the Demonstrations

The Windsor Police Service and its policing partners worked collaboratively to achieve a peaceful resolution to the demonstrations on Huron Church Road near the Ambassador Bridge.

Officers engaged demonstrators throughout the incident for the purpose of continued communication, negotiations, and enforcement. As a result, several charges were laid and vehicles were seized.

Since the onset of the demonstrations, a total of;

- 46 arrests have been made
- A total of 90 charges was laid by police
- 43 charged with breaching a court order
- 43 charged with mischief over \$5000
- One person is facing a charge of obstruct justice
- One person is charged with fail to attend court
- One person was charged with dangerous driving
- One person is facing a Highway Traffic Act Charge for Failing to Remain
- 37 vehicles were seized/towed since the onset of the demonstrations.

There will be continued police presence in the demonstration area to ensure public safety. There will be zero tolerance for any unlawful activity. There are ongoing investigations into the protestor's activity.

We want to thank the public for your patience and support.

For further information:

Contact the WPS Corporate Communication Unit's Public Information Officer at (519) 255-6700 ext. 4204.

Content posted by:

Constable Talya Natyshak
Corporate Communications Unit
Windsor Police Service - Headquarters
Windsor, Ontario, Canada
Office: (519) 255-6700 ext. 4204

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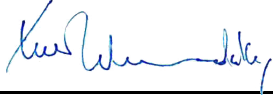
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Update #4- Emerson Border Crossing

📅 February 15, 2022

Statement

🌐 Winnipeg, Manitoba

Statement from Chief Superintendent Rob Hill, Officer in Charge of Criminal Operations for the Manitoba RCMP

"Since the beginning of the blockade of Highway 75 at Provincial Road 243, Manitoba RCMP officers have worked to peacefully resolve the situation.

We are now confident that a resolution has been reached and that demonstrators will soon be leaving the area and that full access to the Emerson Port of Entry will be restored. The Manitoba RCMP is coordinating the departure of the remaining demonstrators and expects that this will be completed by Wednesday, February 16, 2022."

–30–

Contact information

RCMP Media Relations

204-983-8497

Media.Relations.RCMP.Manitoba@rcmp-grc.gc.ca

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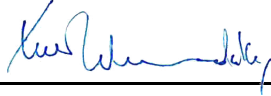
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Premier's letter to PM contrasts with public remarks about blockade

By: Carol Sanders and Dylan Robertson

Posted: 7:29 PM CST Tuesday, Feb. 15, 2022

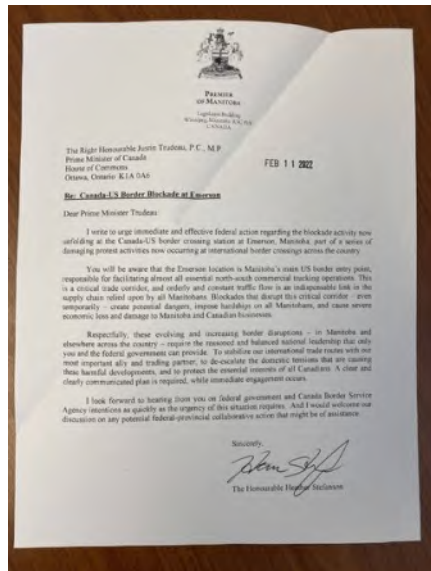


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Premier Heather Stefanson's letter to the prime minister didn't ask him to lift vaccine mandates for truckers, but a spokeswoman for the premier said Tuesday that was the intended message.

Premier Heather Stefanson pleaded in a private letter to Prime Minister Justin Trudeau to intervene at the Emerson border blockade just days before she publicly opposed his decision to enact the federal Emergencies Act against protesters.

In a Feb. 11 letter obtained by the *Free Press*, Stefanson asked Trudeau to take "immediate and effective" action as she pleaded for "national leadership that only you and the federal government can provide."



SUPPLIED

Premier Stefanson's letter warned of "urgency" and "dangers," a tone that was absent in her public comments about relying on police to resolve the situation peacefully.

Yet, at a news conference on Monday, Stefanson said local leaders had the situation under control, and she feared if the federal government wielded power under the Emergencies Act, it would "escalate situations."

Her Feb. 11 letter said the situation was urgent and blockades that disrupt "this critical corridor — even temporarily — create potential dangers, impose severe hardships on all Manitobans and cause severe economic loss and damage to Manitoba and Canadian businesses."

Her letter warned of "urgency" and "dangers," a tone that was absent in her public comments about relying on police to resolve the situation peacefully.

On Tuesday, RCMP announced the blockade, which began Feb. 10, was expected to end Wednesday.

The premier and Justice Minister Kelvin Goertzen issued a statement Tuesday commending "the expert and

professional management of the provincial RCMP in respectfully de-escalating this situation without the use of force."

NDP Leader Wab Kinew said the premier's failure to act on the blockade at the Emerson border crossing — where \$73 million in goods are shipped every day — and the protests that have disrupted downtown Winnipeg since Feb. 4 is "irresponsible."

He said Stefanson's letter to the PM versus what she said publicly shows she's not telling Manitobans what she really believes.

"The premier can say one thing publicly and write another thing behind the scenes," Kinew said.

"Actions speak louder than words. The premier's inaction really tells you where her heart lies. The fact that she did nothing shows an irresponsibility," Kinew said.

The premier had been telling Manitobans they have to trust police to peacefully negotiate an end to the blockade. She's also called on the federal government to lift the vaccine mandates for truckers and urged Canada to work with the U.S. to do likewise.

The premier's letter to the prime minister didn't ask him to lift vaccine mandates for truckers, but a spokeswoman for the premier said Tuesday that was the intended message.

No one had expected Trudeau to invoke the far-reaching power of the Emergencies Act, she said.

"The unprecedented use of this sweeping legislation had never been raised before Monday, and is not necessary in Manitoba. The premier, along with several other premiers, took issue with the blanket use of the Emergencies Act across the country," the spokeswoman told the *Free Press*.

"Last Friday the premier wrote to the prime minister requesting a clear and clearly communicated plan to de-escalate tensions at the border. The premier felt a clear federal road map and timetable on relaxing border restrictions would be timely and constructive. Not just for truckers, but for all Canadians looking for a return to some kind of normalcy after nearly two long years," the premier's spokeswoman said.

"As everyone knows, the protests at the border started when the prime minister announced mandates for the trucking industry at the border - the same people who had been delivering goods and services throughout the entire pandemic. As this was mandated federally only, the PM could change this policy, and only he could engage with the U.S. administration, she said.

Stefanson also had a call with North Dakota Gov. Doug Burgum on Friday, to exchange information, discuss concerns, and talk about advocacy on the U.S. side of the border, she said.

carol.sanders@freepress.mb.ca

dylan.robertson@freepress.mb.ca

Dylan Robertson

Parliamentary bureau chief

In Ottawa, Dylan enjoys snooping through freedom-of-information requests and asking politicians: "What about Manitoba?"

Carol Sanders

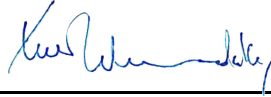
Legislature reporter

After 20 years of reporting on the growing diversity of people calling Manitoba home, Carol moved to the legislature bureau in early 2020.

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Feedback

A further Notice to Demonstrators

Posted On Wednesday February 16, 2022

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FOR IMMEDIATE RELEASE: Wednesday, February 16, 2022 4:53pm

(Ottawa)—The Ottawa Police Service wants to inform you that under provincial and federal legislation, you will face severe penalties if you do not cease further unlawful activity and remove your vehicle and/or property immediately from all unlawful protest sites.

- You may be arrested and charged with criminal offences including but not limited to mischief, and potentially charged with a variety of other non-criminal offences.
- Your vehicle and property may be seized or removed.
- Your driver's licence may be suspended or cancelled.
- CVOR (Commercial Vehicle Operator's Registration) certificates may be suspended or cancelled.
- Your personal or business bank accounts, including virtual currency, may be subject to examination and restriction.
- If you bring a minor (a person under 18) with you to an unlawful protest site, you may be charged and fined up to \$5000 and/or potentially spend up to five years in prison.
- Those who are delivering fuel and other supplies to those taking part in the unlawful demonstration can be charged.
- Persons traveling to any other unlawful protest sites to participate in or support the unlawful demonstration can be charged.
- Be aware that legislation now prohibits interference with any critical infrastructure including 400-series highways, railways, airports and international border crossings.

- 30 -

CONTACT:

Media Relations Section

Tel: 613-236-1222, ext. 5366

FOR IMMEDIATE RELEASE: Wednesday, February 16, 2022 10:30 am

Notice to Demonstrators

(Ottawa)—You must leave the area now. Anyone blocking streets, or assisting others in the blocking streets, are committing a criminal offence and you may be arrested. You must immediately cease further unlawful activity or you will face charges. If you are arrested you may be released on bail depending on factors contained in Part XVI of the Criminal Code.

The people of Ottawa are being denied the lawful use, enjoyment and operation of their property and you are causing businesses to close. That is mischief under the Criminal Code.

Charges and/or convictions related to unlawful activity associated with the demonstration may lead to denial in crossing the USA border.

The Federal Emergencies Act allows for the regulation or prohibition of travel to, from or within any specified area. This means that anyone coming to Ottawa for the purpose of joining the ongoing demonstration is breaking the law. The act also provides police with a number of measures including the ability to seize vehicles that are part of this demonstration.

Ontario law (EMCPA) now prohibits interference with any critical infrastructure including 400-series highways, railways, airports and international border crossings. It prohibits you from preventing someone from travelling to or from walkways, bridges and highways (other than 400 series highways) or preventing anyone from using them. It also prohibits someone from seriously interfering with the safety, health or well-being of members of the public.

Anyone who commits these illegal actions could face fines or be required to appear in court. Commercial vehicle drivers' licences and private drivers' licences can be suspended or revoked.

- 30 -

CONTACT:

Media Relations Section

Tel: 613-236-1222, ext. 5366

FOR IMMEDIATE RELEASE: Wednesday, February 9, 2022 2:57pm

Message to Demonstrators from the Ottawa Police Service

(Ottawa)—It is a criminal offence to obstruct, interrupt or interfere with the lawful use, enjoyment, or operation of property.

The offence is known as mischief to property.

The unlawful act of blocking streets in the downtown core is resulting in people being denied the lawful use, enjoyment and operation of their property.

We are providing you notice that anyone blocking streets or assisting others in the blocking of streets may be committing a criminal offence.

You must immediately cease further unlawful activity or you may face charges.

You could be arrested without a warrant for this offence if you are a party to the offence or assisting others in the direct or indirect commission in this offence.

Whether you are released on bail depends on factors contained in Part XVI of the ***Criminal Code***.

Offence-related property, including vehicles, may be seized as part of the offence. The vehicles may be detained and, following a conviction, possibly forfeited.

Charges or convictions related to the unlawful activity associated with the demonstration may lead to denial in crossing the USA border.

- 30 -

CONTACT:

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Email Us

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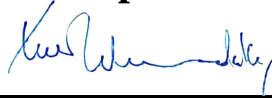
Ottawa Police Service P.O. Box 9634 Station T, Ottawa, Ontario, K1G 6H5, T: 613-236-1222, *TTY service for the deaf, deafened and hard of hearing: 613-232-1123*

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A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



Police issue order for Ottawa convoy protesters to leave immediately

MARIEKE WALSH > , KRISTY KIRKUP > AND MICHELLE CARBERT >

OTTAWA

PUBLISHED FEBRUARY 16, 2022



In a flyer handed out to demonstrators on Wednesday, police said they needed to clear the area and that anyone blocking streets or assisting others in doing so would be committing a criminal offence.

“The people of Ottawa are being denied the lawful use, enjoyment and operation of their property and you are causing businesses to close,” the flyer said. “That is mischief under the Criminal Code.”

The notice also said charges and/or convictions could mean denial of entry to the United States.

On Monday, Prime Minister Justin Trudeau invoked the never-before-used Emergencies Act in response to blockades. The following day, Ottawa’s police chief resigned amid intense criticism from city councillors and residents over the service’s handling of the crisis.

Public Safety Minister Marco Mendicino defended the sweeping emergency declaration on Wednesday, saying several protesters who blockaded the border in Alberta have ties to a far-right extremist organization with leaders in the country’s capital.

At a city-council meeting, Ottawa Mayor Jim Watson urged protesters to leave as the presence of local police, Ontario Provincial Police (OPP) and RCMP grows stronger. Mr. Watson said it is his understanding that those who want to leave now will be allowed to do so, unless they have committed criminal acts.

“The window of opportunity for you to leave our city is closing,” he said. “If you leave now voluntarily, the odds of you being able to leave with your property are quite high.”

Ottawa pushes ahead with Emergencies Act as border protests end

whatever means possible to bring about a safe outcome and restore order.

Many demonstrators were defiant in the face of the new notice from police on Wednesday. Some continued undeterred with their lunch-time pig roast over a spit beside parked trucks and food tents. Others left toilets out beside their trucks for protesters to dump the police flyers. Many have written the street address where they are parked on the outside of their truck, or installed a mailbox.

In front of the Parliament buildings on Wellington Street, truckers blocking the intersection blared their horns despite a court injunction and protesters continued dancing in the intersection. Further down the street, a shirtless man danced on top of a concrete barrier in front of a row of trucks, waving a sign that said, “hold the line” on one side and “stand up Canada” on the other.

The court injunction against protesters honking their horns was largely respected last week but has been ignored since the weekend. On Wednesday, horns were again blasted throughout the downtown. Ontario Superior Court Justice Hugh McLean on Wednesday extended a prohibition on truck and air horns for an additional 60 days that will last until mid-April.

Lloyd Crowe, a soybean farmer from Prince Edward County, said he doesn’t think the police have any legal reason to force his rig to leave downtown Ottawa. But the truck he has been sitting in for three weeks does not belong to him, and he said he would move under the threat of bank accounts being frozen.

“It’s my uncle’s truck and I promised if it came to freezing his bank account, I would comply,” he said. “But I will go back home and get one of my farm trucks and come back.”

mandate, insisted people are allowed to come to Ottawa with their children if they choose to engage in peaceful, lawful protest.

He said people are only restricted in coming to the capital with the intention to engage in violence, block critical infrastructure or disrupt trade. He also called the invocation of the Emergencies Act “an extreme and authoritarian measure.”

Mr. Trudeau said Wednesday that the government has given police forces more tools by invoking the act, but he underscored the ultimate enforcement decisions will be made by police.

Conservative Party interim leader Candice Bergen said her party will not back the government’s emergency declaration, while NDP Leader Jagmeet Singh said New Democrats will support it.

Scot Wortley, a University of Toronto criminology professor, said there has been a change in the police approach to the Ottawa demonstration in recent days, with the establishment of the Integrated Command Centre on the weekend. The command centre brings together RCMP, OPP and the Ottawa Police Service to better co-ordinate a response to the protests.

OPP deputy commissioner Chris Harkins said Wednesday that provincial police, the RCMP and the Ottawa police will ensure there is a “peaceful resolution to this situation and bring relief to the residents of Ottawa.”

Given the unprecedented nature of the demonstration, Prof. Wortley said it’s hard to say how and when it will end. He said violence is a concern, as there are worries about protesters using big rigs and weapons that they may have in their vehicles in a potential police confrontation. He cited a Monday RCMP raid in in Coutts, Alta., where police seized a

ineffectiveness” of the Canadian political system to address protesters in a meaningful way that leads to conflict resolution.

With reports from Robert Fife, Janice Dickson and Joy SpearChief-Morris in Ottawa.

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Nur Muhammed-Ally, Counsel

February 16, 2022
Ottawa, Ontario

Today, Prime Minister Justin Trudeau convened a fourth meeting of the Incident Response Group to discuss the public order emergency the government declared under the *Emergencies Act*, and how it continues to help address the ongoing illegal blockades and occupations that are hurting Canadians across the country. He was joined by ministers and senior officials focused on evaluating actions being taken to end the illegal occupations and restore public safety.

The Prime Minister and ministers emphasized the importance of ensuring the measures continue to be targeted, temporary, proportional to the threats posed to Canadians, and compliant with the *Canadian Charter of Rights and Freedoms*.

The Prime Minister and ministers discussed the role the emergency measures will play in strengthening and supporting law enforcement across the country, as well as restoring confidence, safeguarding institutions, and protecting the safety of everyone in Canada after almost three weeks of illegal blockades. The group discussed the implementation of finance-related measures under the *Emergency Economic Measures Order* to provide stricter oversight of foreign funds, identify accounts suspected to be involved in criminal activity, and provide authority for all orders of government to share relevant information with financial institutions.

The Prime Minister and ministers were briefed on the work of the Canada Border Services Agency, Royal Canadian Mounted Police (RCMP), and Ontario Provincial Police (OPP) who, together with other law enforcement agencies, including the Windsor Police Service, have brought a safe and successful resolution to the blockade of key ports of entry, which involved arrests and weapon seizures. This includes three of the most important border crossings in Canada, including the Ambassador Bridge in Windsor, Ontario, the port of entry at Coutts, Alberta, and the Pacific Highway border crossing south of Surrey, British Columbia, which are now open to trade and travel. The Prime Minister and ministers were also briefed on the clearing earlier today of the port of entry in Emerson, Manitoba.

The Prime Minister and ministers were updated on the latest situation facing Ottawa, and local enforcement efforts to end the illegal occupation of downtown. The group was briefed on the collaboration of the joint RCMP, OPP, and Ottawa Police Service enhanced Integrated Command Centre. They also discussed the importance of preventing further blockades from emerging in other communities, and committed to continue providing all appropriate available federal resources to provinces, municipalities, and law enforcement agencies to protect public order and keep people and communities safe.

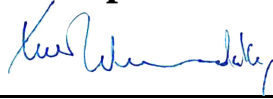
Associated links

- Federal government declares a public order emergency under the *Emergencies Act* to end disruptions, blockades, and the occupation of the city of Ottawa (<https://www.canada.ca/en/public-safety-canada/news/2022/02/federal-government-declares-a-public-order-emergency-under-the-emergencies-act-to-end-disruptions-blockades-and-the-occupation-of-the-city-of-ottawa.html>)
- Canada invokes the *Emergencies Act* to limit funding of illegal blockades and restore public order (<https://deputypm.canada.ca/en/news/news-releases/2022/02/15/canada-invokes-emergencies-act-limit-funding-illegal-blockades-and>)
- Prime Minister Justin Trudeau convenes the Incident Response Group (<https://pm.gc.ca/en/news/readouts/2022/02/10/prime-minister-justin-trudeau-convenes-incident-response-group>)
- Prime Minister Justin Trudeau convenes the Incident Response Group on the ongoing illegal blockades (<https://pm.gc.ca/en/news/readouts/2022/02/12/prime-minister-justin-trudeau-convenes-incident-response-group-ongoing>)

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A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

Update #5 – Blockade at Emerson border crossing now cleared

February 16, 2022
Emerson, Manitoba

News release



(/sites/default/files/styles/cropped_large/public/news-nouvelles/2022-02-16/emerson_1.jpg?itok=jkf7Vvna)



(/sites/default/files/styles/cropped_large/public/news-nouvelles/2022-02-16/emerson_3_2.jpg?itok=rZKg9Lml)



(/sites/default/files/styles/cropped_large/public/news-nouvelles/2022-02-16/emerson_3_1.jpg?itok=ZbuESCPP)



(/sites/default/files/styles/cropped_large/public/news-nouvelles/2022-02-16/emerson_4.jpg?itok=bdh3KkT1)

On the morning of February 10, 2022, semi-trailers, farm implements, and passenger vehicles began blocking the Canada/US border at the Emerson port of entry.

RCMP officers from Emerson and Morris detachments and Manitoba RCMP Divisional Liaison Officers immediately attended the scene, and began to work with the demonstrators to find a peaceful resolution.

At noon today, the remaining demonstrators began to move out of the area and full access to the Emerson Port of Entry is now restored.

The Manitoba RCMP coordinated and escorted the vehicles out of this area to ensure a safe and orderly departure. This was to ensure the safety of all involved.

"Throughout the past six days, our officers continued to use open communication, and a measured approach to find a peaceful resolution to this situation. This continuous dialogue between our officers and the demonstrators enabled us to reach a resolution yesterday," said Chief Superintendent Rob Hill, Officer in Charge of Criminal Operations for the Manitoba RCMP.

The number of vehicles taking part in the blockade has fluctuated throughout the past six days. At its peak, the RCMP estimates there were approximately 75 vehicles.

Through dialogue with the demonstrators last week, emergency vehicles, including police vehicles, as well as some agriculture transports and other critical goods were allowed through the blockade.

Apart from these select vehicles, all four lanes of Highway 75 at Provincial Road 243 remained blocked.

For vehicles that weren't able to get through, RCMP officers diverted traffic to alternate border crossings in Manitoba.

"This highway is prone to closures due to weather. With blizzards in the winter and flooding in the spring, our officers are well versed in alternate paths of travel for commercial and passenger vehicles."

Officers will remain in the area today to ensure that the highway and the border to the United States remains open and accessible to all travellers.

"We would like to thank our partners, Canada Border Services Agency and US Customs and Border Protection, as well as our provincial partners at Manitoba Transportation and Infrastructure. These agencies provided assistance to the Manitoba RCMP throughout the duration of the blockade to ensure cross country border traffic was accommodated at other ports of entry."

–30–

Contact information

RCMP Media Relations

204-983-8497

Media.Relations.RCMP.Manitoba@rcmp-grc.gc.ca (<mailto:Media.Relations.RCMP.Manitoba@rcmp-grc.gc.ca>)

www.rcmp-grc.gc.ca/mb (<http://www.rcmp-grc.gc.ca/mb>)

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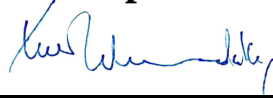
Date modified:

2022-02-16

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April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

February 17, 2022

Ottawa, Ontario

Today, Prime Minister Justin Trudeau convened the fifth meeting of the Incident Response Group to discuss the public order emergency the government declared under the *Emergencies Act*. Joined by ministers and senior officials, he reiterated that the government's priority is to end these illegal blockades and occupations across the country and to restore peace, order, and good government.

The group was provided with an update on the progress in implementing the emergency orders made under the *Emergencies Act*, including finance-related measures under the *Emergency Economic Measures Order*. Personal and corporate accounts suspected to be involved in criminal activity have been frozen and authority is being provided for all orders of government to share relevant information with financial institutions. This includes increased oversight of monies being raised in Canada and abroad via online fundraising platforms.

The group was briefed on the situation in Ottawa, where the Ottawa Police Service, Royal Canadian Mounted Police, Ontario Provincial Police, and other collaborating police forces now have the additional tools and resources they need to bring a safe end to the occupation.

The group discussed the importance of ensuring the measures continue to be targeted, temporary, proportional to the threats posed to Canadians, and compliant with the *Canadian Charter of Rights and Freedoms*. The *Emergencies Act* was invoked to end these almost three weeks of illegal blockades and to protect families, small businesses, and the economy.

Associated links

- Federal government declares a public order emergency under the *Emergencies Act* to end disruptions, blockades, and the occupation of the city of Ottawa (<https://www.canada.ca/en/public-safety-canada/news/2022/02/federal-government-declares-a-public-order-emergency-under-the-emergencies-act-to-end-disruptions-blockades-and-the-occupation-of-the-city-of-ottawa.html>)
- Canada invokes the *Emergencies Act* to limit funding of illegal blockades and restore public order (<https://deputypm.canada.ca/en/news/news-releases/2022/02/15/canada-invokes-emergencies-act-limit-funding-illegal-blockades-and>)
- Prime Minister Justin Trudeau convenes the Incident Response Group (<https://pm.gc.ca/en/news/readouts/2022/02/10/prime-minister-justin-trudeau>)

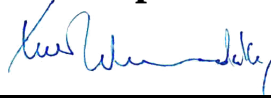
convenes-incident-response-group)

- Prime Minister Justin Trudeau convenes the Incident Response Group on the ongoing illegal blockades (<https://pm.gc.ca/en/news/readouts/2022/02/12/prime-minister-justin-trudeau-convenes-incident-response-group-ongoing>)
- Prime Minister Justin Trudeau convenes the Incident Response Group on the ongoing illegal blockades (<https://pm.gc.ca/en/news/readouts/2022/02/16/prime-minister-justin-trudeau-convenes-incident-response-group-ongoing>)

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Nur Muhammed-Ally, Counsel



OTTAWA POLICE SERVICE
SERVICE DE POLICE D'OTTAWA
A Trusted Partner in Community Safety
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Feedback

Secured Area Established

Posted On Thursday February 17, 2022

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FOR IMMEDIATE RELEASE: Thursday, February 17, 2022 4:40pm

(Ottawa) – Under the Emergencies Act, the Unified Command in control of policing in Ottawa has established a Secured Area to ensure that individuals comply with the Emergency Measures Regulations and to ensure designated places (Parliament, Government buildings, critical infrastructure etc) are protected.

You cannot travel to or within an area where an assembly is taking place contrary to the Regulations.

At this time, the Secured Area is from Bronson Avenue to the Canal, the Queensway to Parliament Hill.

Anyone can enter the Secured Area if you fall under an exemption in the Regulations, meaning that you:

- (a) reside, work or are moving through that area for reasons other than to participate in or facilitate the assembly;
- (b) are acting with the permission of a peace officer or the Minister of Public Safety and Emergency Preparedness;
- (c) are a peace officer; or
- (d) are an employee or agent of the government of Canada or a province who is acting in the execution of their duties.

You can expect to see police checkpoints where you will be asked your reason for travelling within the Secured Area.

You will be required to show proof of exemption for your travel to the Secured Area.

Expect traffic delays in and around the Secured Area. Please avoid the downtown core if you have no reason to be there.

"We do not take this decision lightly, we know this will impact the residents. Please bear with us while we work to return the city to a state of normalcy" stated Interim Chief Steve Bell. "We want to reassure everyone that if you live, work or have a reason to be in the area that your access will be minimally impacted."

We want you to be aware that entering the Secured Area for the purpose of contravening the Emergencies Act, may result in you being arrested and/or charged.

The Secured Area will only be enforced as long as necessary.

- 30 -

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A handwritten signature in blue ink, appearing to read "Nur Muhammed-Ally", is written over a horizontal line.

A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

MICHELLE GOLDBERG

The Giddy, Terrifying Siege of Ottawa

Feb. 17, 2022



By Michelle Goldberg
Opinion Columnist

OTTAWA — When I asked Matthew Wall, a 36-year-old electrician from Manitoba, what brought him to this city, which has been overwhelmed by a giant protest encampment, he answered with one word: “Mushrooms.” Searching for his purpose in life, he said, he went on a psychedelic spiritual journey and had an image of the Freedom Convoy, a demonstration against Covid rules that has converged on the Canadian capital with trucks and other large vehicles.

“I’m here for the rights of our kids, for parents’ rights, for everyone’s rights,” said Wall. “So kids can live in a future where they don’t have to have something covering their face, lose emotion. You don’t have the human connection, don’t see them smile anymore. It’s dehumanizing.” His daughters, he told me, were seeing a school therapist weekly because of the emotional fallout of the pandemic. “You’re taking away the love!” he said.

Wall was sitting in the passenger seat of a black truck owned by a friend he’d made in Ottawa. It was covered in painted slogans, some with imperfect punctuation: “Dad’s On a Mission,” “Bless You in Advance Boys in Blue,” “Superhero’s Never Die.” Notes of thanks were taped to the truck, as were tickets that had been issued to protesters, including one to Wall for “bass noise (or unusual noise or noise that disturbs inhabitant(s) of the city),” which came with a fine of 1,000 Canadian dollars.



Matthew Wall, right, with a fellow protester, Matthew Bujold, in Ottawa on Wednesday. Dave Chan for The New York Times

In the back seat was Jenna Wozney, a 24-year-old actress from Vancouver who’d flown to Ottawa on her own a few days earlier. She said some of her family and friends considered the protests “hateful,” but she’d been determined to see them for herself. Wozney deeply distrusted the vaccines, though she’d given in and gotten the shots in order to be able to work: “I’m so poor, I didn’t have any money, I had to get it,” she said, adding an expletive.

The demonstrations felt, to her, transformative. She saw them, somehow, as the next step after Black Lives Matter and Canada's Every Child Matters movement, which is devoted to Indigenous survivors of abusive residential schools. "I feel like this is the final thing," she said.

"This is an awakening," added Wall.

The day before, Wozney had broken up with her live-in boyfriend, who didn't support her traveling to Ottawa, and canceled her ticket home. She wasn't sure where she was sleeping that night but said several people had offered her a place to stay. At one point, speaking about the harms that she believes, falsely, are coming to children as a result of the coronavirus vaccine, she exclaimed, "I'll die here!"

"I will, too," said Wall.

As I left, they insisted I take some of the fudge a stranger had given them.

The takeover of downtown Ottawa, whose streets are clogged by trucks, trailers and cars, is now approaching its fourth week. Populists and reactionaries worldwide, including Donald Trump and Tucker Carlson, have been thrilled by what's happening here. A relatively small number of people — around 8,000 at the height of the protests, and on most days fewer — have snarled the capital of a major Western country and thrown its left-leaning government into chaos, demanding freedom from Covid-related public health measures. Related encampments on some of the bridges linking Canada to the United States affected hundreds of millions of dollars in trade a day before they were dispersed.



A relatively small number of people have snarled the capital. Dave Chan for The New York Times

There is a debate in Canada about whether Prime Minister Justin Trudeau was justified on Monday in invoking the Emergencies Act, a 1988 law which gives the government the power to override certain civil liberties. But the fact that he resorted to the law — which has never before been used — shows the extent to which the protests are making the capital ungovernable. The tactic of using large vehicles to occupy a big city has inspired similar protests in countries including France, Israel and New Zealand. Trump supporters are planning American versions of the convoys next month. If they succeed in entrenching themselves somewhere, it could be terrifying, not least because unlike the Canadians, they'll probably be heavily armed.

The thrust of the Ottawa protests is clearly reactionary, but there were plenty of people on the streets who seemed genuinely baffled by the media's description of them as part of a far-right movement. They'd been infuriated and in some cases unmoored by Canada's pandemic restrictions, which have been stricter than America's. (As The National Post reported, during the Omicron wave, the provinces of Quebec and Ontario "closed schools and imposed blanket bans on indoor dining, gyms and bars," and Quebec enacted a 10 p.m. curfew.)

Most people I met said they'd never been to a protest before. Their willingness to not just go to Ottawa, but in many cases to stay there in the freezing cold for weeks on end, is a sign of how profoundly the pandemic has eroded trust in the authorities. Two years of Covid has created a climate of suspicion, confusion and grief that the far right has been able to exploit.

By the time I arrived at the beginning of the week, the occupation had shrunk, but the main encampment still spread out several blocks on either side of Ottawa's Parliament Hill as well as down a number of other downtown streets, including some residential blocks. There were more food tents and barbecues than I could count. On Kent Street, people were roasting a whole pig, one of two they said had been donated. Others played hockey on the block between the Supreme Court and the Department of Justice. Someone had brought a hot tub. At times there were bouncy castles for the kids who were visiting, as well as those camped out with their parents. Imagine Occupy Wall Street, but set up by construction workers and military veterans with logistics training.



Diversions for protesters: road hockey near the Supreme Court ... Dave Chan for The New York Times



... and a pig roast. Dave Chan for The New York Times

I didn't see any Confederate or Nazi flags, though there had been some early on. I saw one Gadsden flag, and a guy in a MAGA hat who'd taped over the word "America" and written "Canada" on it. I saw lots of anti-vax paranoia, but few efforts to own the libs. The one word that was repeated over and over again — on signs, in chants and in conversation — was "freedom." Many who'd found the pandemic intolerably alienating were reveling in human connection. Several people hugged me after I interviewed them, even though I told them I was from the hated mainstream media.

Imad Arraj, who installs HVAC systems and helps his wife run an Ottawa hunting and fishing shop, was at the protest on Tuesday night with a cousin. "It did a lot of damage," he said of pandemic restrictions. "Me myself, I'm sitting home, I'm just feeling so down because all these friendships that you used to have, get together for a card game or whatever, it's no longer there. We disconnected from each other." He spoke bitterly of the 10-person limit on indoor gatherings in Ontario over the winter holidays. "We used to have a lot of people at our house — my brothers, my sisters, my mom come to visit," he said sadly.

Before the Freedom Convoy came to Ottawa, Arraj said, he'd never taken part in a demonstration. "I was in depression, sitting at home. I thought I was alone. I thought I was going crazy. I thought I was the only person thinking that way," he said. "And when this happened, I came down to see." What he saw uplifted him. "The love that you'll receive here, you are never, ever going to see it anywhere else," he said.

For many other Ottawans, though, the protests have been a siege, not a love fest. Locals described the incessant blaring of horns — which have ebbed, but not stopped, after an injunction — as a form of psychological torture. An Asian-inspired ice cream shop closed for several days after a member of its staff who was walking to work was confronted by two men and shoved to the ground for wearing a mask. "Based on the accounts we've heard from our neighbors, this behavior is not an isolated incident," said a statement on the shop's Instagram feed.

Not everyone at the protests comes from the far right, but the organizers do. Among them are Tamara Lich, formerly a leading figure in the fringe Maverick Party, which promotes the secession of three of Canada's Western provinces, and Patrick King, a "great replacement" conspiracy theorist who has railed against a plot to use refugees "to depopulate the Anglo-Saxon race because they are the ones with the strongest bloodlines."

The crowds themselves contain a number of extremists. At an encampment at the border crossing in Coutts, Alberta, four people were arrested and charged with conspiracy to murder police officers. Two of them reportedly had ties to a white nationalist network called Diagonol, whose founder, Jeremy MacKenzie, has been part of the Ottawa demonstrations.



A protester refilling his generator. Dave Chan for The New York Times

“One of the dynamics here is there are multiple faces to this occupation,” said Jeff Leiper, a member of the Ottawa City Council. “On weekends, there’s a party happening in occupied downtown — you’ve seen the stage, you’ve seen the bouncy castles, you’ve seen the hot tubs, you’ve seen the D.J.s. And that is one face of it.” But the other face has been more sinister.

Throughout the protests, men in black pickup trucks flying Canadian flags have menaced people in residential neighborhoods. “Frequently, over and over again, we get the reports from residents that the trucks are slowing down, they’re accosting residents on the street for wearing masks, and frequently they’re accompanying that with some sort of misogynist, homophobic or racist slur,” said Leiper.

Near the encampments, the restaurants and stores on some shopping streets, as well as the Rideau mall, have been shut for weeks, after being flooded with defiantly unmasked visitors when the convoys first arrived. Those who were horrified by the invasion of their city kept wondering: Where were the police? On Wednesday, cops handed out fliers warning protesters that they were subject to arrest. Under the Emergencies Act, the flier said, “anyone coming to Ottawa for the purpose of joining the ongoing demonstration is breaking the law.” But until Thursday, when the police started making arrests, their presence was minimal, and people continued to bring wagons full of fuel containers into the encampment to keep their engines running.



A trucker waving a notice from the police. Dave Chan for The New York Times

Once the protesters had lodged their vehicles in the city, there was no straightforward way to get them out. Some towing companies refused to cooperate with the police, but even if they were willing to help clear the roads, it was hard to see how they could remove the vehicles — some with their wheels taken off — without being swarmed. Arresting the demonstrators first, however, would be a struggle, because they could hide in their cars, trucks and trailers. The presence of children complicated matters further.

“I don’t think any of us have accepted at this point it’s inevitable that this will end in a firefight,” Leiper said on Wednesday. But, he added, “we’re all worried about it.” The day before, Ottawa’s police chief had resigned over his handling of the crisis.

Back at the occupation, I met Dana Wilson, who told me he was raised in Mississippi and had served in the U.S. military in Central America before moving to Canada in 1987. He gestured to a cluster of men nearby and said that they were veterans as well, and that he was part of a group led by a retired colonel. “From a military man’s perspective, you want to talk jargon, this is the last hill,” he said, describing Trudeau as “a narcissistic globalist sociopath” who has used “medical tyranny” to control the population, all for profit.

I asked him what he thought would happen when the police moved in. “We’ve got some things that we’re not prepared to talk about,” he said slyly. “We’ve got an arsenal, too. People power, darling.” When I pressed, he said that the arsenal was metaphorical. He called the encampment “the Canadian Alamo,” but then said that was a metaphor, too. At one point he said he didn’t believe there would be a police confrontation because Canadians wouldn’t stand for it; like others at the Freedom Convoy, he was convinced that the population is on his side, which polls show is very much not the case. (In one survey, 65 percent of respondents called the convoy “a small minority of Canadians” who were behaving “selfishly.”)

But he also seemed prepared for violence. Of the police, he said, “I hope they don’t start shooting people like they did at Kent State, but you know what, the world’s got to see.”

However the protests resolve, Elizabeth Simons, deputy director of the Canadian Anti-Hate Network, an organization akin to the Southern Poverty Law Center, expects the far-right forces behind them to be emboldened. “It’s a populist movement,” she said. “We have people who feel that they are the pure public fighting for the rights of the people versus the corrupt elite, which is government, media. That’s going to resonate with a lot of people when we’re two years into a pandemic where there is legitimate grievance and criticism” of how the authorities have handled things.

Nobody, she said, “has come out of the last two years unscathed. Everyone’s affected in some way. It’s just which direction do they choose to go.” And how far.

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Michelle Goldberg has been an Opinion columnist since 2017. She is the author of several books about politics, religion and women's rights, and was part of a team that won a Pulitzer Prize for public service in 2018 for reporting on workplace sexual harassment. [@michelleinbklyn](#)

A version of this article appears in print on , Section A, Page 21 of the New York edition with the headline: The Giddy, Terrifying Siege of Ottawa

This is Exhibit “EEEE” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



NEWS

Police operation – House will not sit on Friday, February 18

Ottawa, Ontario – February 18, 2022

As per the Parliamentary Protective Service's (PPS) most recent email notification, a police operation is expected to take place on Wellington Street and other locations in the downtown core of Ottawa.

Given these exceptional circumstances, and following discussion with all recognized party leadership, the sitting today is cancelled. More information will follow.

We wish to remind everyone that safety is paramount. The situation is ever-changing. The continued presence of vehicles and demonstrators associated with the convoy, alongside police operations, will impact the downtown core.

If you are not in the House of Commons precinct, **stay away from the downtown core until further notice.** The PPS will advise when it is safe to return downtown. Should you already be in the precinct, please **remain in the building** and **await further instructions from PPS officers.**

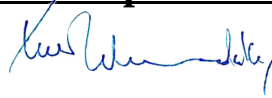
Please stay close to your devices and watch for updates from the PPS.

Hon. Anthony Rota, M.P.

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A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

February 18, 2022
Ottawa, Ontario

Today, Prime Minister Justin Trudeau convened the sixth meeting of the Incident Response Group where ministers and senior officials provided updates on the progress being made under the *Emergencies Act* to end the illegal blockades and occupations that started last month.

The group was briefed on the ongoing police enforcement efforts in Ottawa where the Royal Canadian Mounted Police, the Ottawa Police Service (OPS), Ontario Provincial Police, and other law enforcement agencies from across the country have moved into the downtown core. As a result of the enforcement actions, some protesters and people are leaving the area.

The group were briefed on the comments made this afternoon by the Acting Chief of OPS who stated that the federal *Emergencies Act* along with provincial and city emergencies declarations gave police the tools to use new and existing powers to be able to properly deal with the demonstration to ultimately bring it to an end. The group noted the situation in Ottawa resulted in the unprecedented cancellation of today's sitting of the House of Commons and the extension of the adjournment period of the Senate of Canada until February 21 due to the ongoing enforcement operations.

The group was provided with an update on the progress in implementing finance-related measures under the *Emergency Economic Measures Order*. Financial Services providers have frozen several accounts. Additionally, FINTRAC's pre-registration process is ongoing as it responds to several dozen inquiries received from small and medium-sized banks on the impact of the *Emergencies Act* orders.

The group was briefed on the work by other federal agencies involved as well as efforts underway in other sites across the country to avoid any further blockades. They reconfirmed the ultimate goal is to bring a safe end to these illegal blockades and occupations across the country and see order restored. They were reassured the use of temporary powers being exercised under the *Emergencies Act* is being done responsibly and proportionately.

Associated links

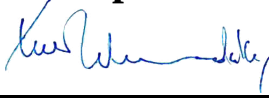
- Prime Minister Justin Trudeau convenes the fifth Incident Response Group meeting on the illegal blockades and occupations (<https://pm.gc.ca/en/news/readouts/2022/02/17/prime-minister-justin-trudeau-convenes-fifth-incident-response-group>)
- Remarks by the Deputy Prime Minister and Minister of Finance regarding the *Emergencies Act* and the Trans Mountain Expansion Project (<https://deputypm.canada.ca/en/news/speeches/2022/02/18/remarks-deputy-prime-minister-and-minister-finance-regarding-emergencies>)
- Federal government declares a public order emergency under the *Emergencies Act* to end disruptions, blockades, and the occupation of the city of Ottawa (<https://www.canada.ca/en/public-safety-canada/news/2022/02/federal-government-declares-a-public-order-emergency-under-the-emergencies-act-to-end-disruptions-blockades-and-the-occupation-of-the-city-of-ottawa.html>)
- Canada invokes the *Emergencies Act* to limit funding of illegal blockades and restore public order (<https://deputypm.canada.ca/en/news/news-releases/2022/02/15/canada-invokes-emergencies-act-limit-funding-illegal-blockades-and>)

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A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

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Local News

The occupation of Ottawa: a timeline

A day-by-day accounting of events leading up to the police moving in on "Freedom Convoy" Protesters in downtown Ottawa.

Andrew Duffy

Feb 18, 2022 • February 24, 2022 • 9 minute read • [Join the conversation](#)



One protester danced shirtless for about half an hour, despite the presence of riot police from the Sûreté du Québec. PHOTO BY KELLY EGAN /Postmedia

Friday, Jan. 14

STORY CONTINUES BELOW

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[One-Week Pass](#)



A now-ex member of the western separatist Maverick Party, Tamara Lich, a former fitness instructor, launches a fundraiser on GoFundMe for “Freedom Convoy 2022.” She bills it as a transport truck protest against government vaccine mandates: “We are taking our fight to the doorsteps of our federal government and demanding that they cease all mandates against its people.”

Some truckers are upset by new U.S. government rules requiring that they be fully vaccinated to enter the country. Similar rules in Canada bar unvaccinated U.S. drivers.

Monday, Jan. 24

Protesting truckers begin to approach Ottawa from east and west; some of the convoys are reported to be several kilometres long.

Wednesday, Jan. 26

The online fundraiser for the convoy tops \$5 million as the leading edge of the convoy crosses into Ontario from Manitoba.

STORY CONTINUES BELOW

Ottawa police Chief Peter Sloly calls the looming protest “a very fluid situation,” and warns local residents that disruptions could continue through the weekend in the downtown core.

Convoy organizers announce their destination as Parliament Hill. Planning for the arrival of up to 2,000 vehicles, the police say they’ll emphasize communication, de-escalation and peacekeeping.

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Thursday, Jan. 27

As trucks mass outside Ottawa, GoFundMe releases \$1 million in donations to the truckers.

STORY CONTINUES BELOW

Believing the truckers have a legitimate right to protest, Soly rejects an appeal by federal officials to keep trucks away from Parliament Hill and the Prime Minister's Office.

Friday, Jan. 28

Trumpeting air horns and draped in Canadian flags, several hundred trucks arrive in downtown Ottawa. A heavy police contingent meets the trucks and directs them to Wellington Street. By late afternoon, the street in front of Parliament Hill is jammed. Police keep one lane open for emergency vehicles.

Protesters gathered around Parliament Hill and the downtown core for the Freedom Convoy protest, some making their way from various locations across Canada, Sunday January 30, 2022. PHOTO BY ASHLEY FRASER /Postmedia

Saturday, Jan. 29

About 3,000 trucks and more than 15,000 protesters converge on downtown Ottawa, accompanied by the ongoing cacophony of air horns.

The Rideau Centre closes in the afternoon after maskless protesters confront masked employees. At the nearby Shepherds of Good Hope, protesters harass staff and demand food from its soup kitchen. A woman dances on the National War Memorial, and others in the crowd drape flags and anti-vaccine signs on the Terry Fox statue. Ottawa paramedics ask for police escorts after two ambulances are pelted with rocks. Some people openly display racist symbols such as swastikas and Confederate flags.

STORY CONTINUES BELOW

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The police do not intervene.

Sunday, Jan. 30

The Ottawa police launch criminal investigations into the events at the National War Memorial and the Terry Fox statue, while a sympathy blockade in Courtts, Alta. shuts down access to the U.S.-Canada border crossing.

**Monday, Jan. 31**

Sloly defends the inaction of police – only one arrest was made on the weekend – saying officers had to ignore offences given the risk to public safety and themselves. Using force to make arrests, he says, could have incited a riot. Describing the protest as massive and dangerous, Sloly praises officers for preventing injuries and deaths.

Prime Minister Justin Trudeau, addressing the issue for the first time, says his government won't give in to “those who fly racist flags” or “engage in vandalism.”

STORY CONTINUES BELOW

“We are not intimidated,” he says.

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A file photo of Ottawa Police Service Chief Peter Sloly. PHOTO BY TONY CALDWELL /Postmedia

Tuesday, Feb. 1

Élisabeth Bruyère Hospital staff report being harassed for wearing masks on the street. Premier Doug Ford appeals to the truckers to leave, saying they've been heard: "Now it's time to let the people of Ottawa get back to their lives."

Somerset Ward Coun. Catherine McKenney calls on the RCMP to assume policing duties near Parliament Hill so Ottawa police can concentrate on helping the surrounding neighbourhoods.

Wednesday, Feb. 2

At a briefing, Sloly warns city councillors the protest will likely grow and that he does not see a way to end it with police resources alone. "The longer this goes on, the more I am convinced there may not be a police solution to this demonstration," he says. Sloly suggests the military may have to be called in to help.

STORY CONTINUES BELOW

Officials also reveal that protesters, through negotiations with police, have been allowed to set up a logistics camp in the city-owned baseball stadium on Coventry Road.

Federal Conservative Erin O'Toole is voted out as party leader by a majority of his caucus members.

Thursday, Feb. 3

Freedom Convoy organizer Tamara Lich tells a news conference the protesters plan to stay in Ottawa "until we see a clear plan" for the elimination of all COVID-19 mandates.

Mayor Jim Watson asks Public Safety Minister Marco Mendicino for more federal resources to support Ottawa police.

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Police patrol downtown Ottawa as a protest against COVID-19 public health measures enters its 11th day, with trucks and other vehicles blocking several streets on February 7, 2022. PHOTO BY TONY CALDWELL /Postmedia

Friday, Feb. 4

Ottawa police announce a “surge and contain strategy” to improve safety in downtown neighbourhoods. A crisis management firm, Navigator, helps police manage their communications.

STORY CONTINUES BELOW

A wooden shack is built near Confederation Park to serve as a “community kitchen” for protesters.

Ottawa lawyer Paul Champ files a \$9.8 million class-action lawsuit against organizers of the protest on behalf of plaintiff Zexi Li, a 21-year-old public servant.

GoFundMe closes off a \$10 million fundraising account for the convoy, saying the protest violated its terms of service. It later agrees to refund all donations.



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A carnival atmosphere prevails in downtown Ottawa where children play in bouncy castles and two demonstrators ride on horseback, one carrying a Trump 2024 flag. Conservative MPP Randy Hillier tells about 5,000 Parliament Hill protesters, “This is the hill we die on.”

About 300 counter-protesters gather in front of city hall and face off with convoy protesters on the other side of Laurier Avenue.

STORY CONTINUES BELOW

At a police board meeting, chair Diane Deans says the city is under siege: “This group is emboldened by a lack of enforcement by every level of government.”

Police leaders concede they weren’t prepared for what has become an occupation. “I don’t think we could have predicted what this has turned into,” says Deputy Chief Trish Ferguson.

Sloly says he didn’t have enough resources to end the occupation.

Fireworks cap off the night in the “red zone” downtown.

Sunday, Feb. 6

Mayor Watson declares a city-wide state of emergency. He says protesters “are calling the shots” inside the red zone.

Ottawa police announce anyone who attempts to resupply demonstrators with fuel will be subject to arrest.

Protesters bring jerrycans of fuel into the downtown core as the truck convoy continues to shutdown Wellington Street and other major routes. PHOTO BY ERROL MCGIHON /Postmedia

Monday, Feb. 7

Protesters openly defy the police ban on refueling by filling some jerry cans with water, others with gasoline.

STORY CONTINUES BELOW

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Sloly says he needs 1,800 officers from other services to end the protest. The Ottawa police has 1,200 sworn officers. "There are lessons to be learned, good, bad and ugly about what has taken place here," he says.

Watson and Deans write to the prime minister, asking for more resources.

Ontario Superior Court Justice Hugh McLean grants a 10-day injunction against horn honking in downtown Ottawa.

In Windsor, Ont., protesters block the Ambassador Bridge, Canada's busiest border crossing.



Tuesday, Feb. 8

Horns in downtown Ottawa fall silent for the first time in 11 days in response to the injunction.

Police reveal the presence of children among the protesters is complicating their response to the crisis. Another complication is the fact that some heavy tow truck companies are refusing to move trucks from downtown Ottawa, the city says.

STORY CONTINUES BELOW

A new "Freedom Convoy" fundraiser on the U.S. Christian crowdfunding platform GiveSendGo raises more than US\$6.3 million in just four days.

Wednesday, Feb. 9

Ottawa police warn that anyone who continues to block the street with a vehicle could face criminal mischief charges.

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Some trucks circled at the Ottawa International Airport on February 10, 2022. PHOTO BY JEAN LEVAC /POSTMEDIA

Thursday, Feb. 10

Protesters circle the airport, driving slowly, in an attempt to disrupt operations while videos surface of protesters in Ottawa swearing themselves in as “peace officers.”

The Ontario government obtains a court order, freezing money collected for protesters by GiveSendGo.

Conservative leadership candidate and Carleton MP Pierre Poilievre says in an interview: “I’m proud of the truckers and I stand with them.”

Friday, Feb. 11

STORY CONTINUES BELOW

Ford declares a state of emergency in Ontario and tells those in Ottawa who have “held the city hostage for two weeks” to go home.

In Windsor, Trudeau suggests Ottawa police have the resources they need to end the protest. “I don’t accept the contention that the city of Ottawa has exhausted its tools and its resources,” he says.

Sloly tells the police board: “As soon as the new provincial orders are in effect, we will enforce them to the fullest extent that our resources allow.”

Deans backs the chief in public, saying “I have confidence.”

Protesters in downtown Ottawa set up a large sound stage and hot tub.

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Protesters Jean-Philippe and Gabriel, who declined to give their last names, sit in a hot tub at the protest in downtown Ottawa in this photo from Thursday, February 17, 2022. PHOTO BY LARS HAGBERG /REUTERS

Saturday, Feb. 12

Ottawa police launch an integrated command centre with the OPP and RCMP as an influx of weekend protesters again descends on the city.

STORY CONTINUES BELOW

Police begin to forcibly remove protesters from the Ambassador Bridge in Windsor, Ont.

Counter-protesters march through the Glebe, demanding police action in Ottawa.

Sunday, Feb. 13

Counter-protesters block 25 convoy vehicles near Billings Bridge and surround them for seven hours before allowing them to leave one at a time.

A letter released by the city confirms Mayor Watson offered to meet with organizer Tamara Lich if the protesters agree to move their trucks from residential areas.

Monday, Feb. 14

Trudeau invokes the Emergencies Act to assist authorities in confronting the "Freedom Convoy."

Ontario Superior Court Justice Faye McWatt grants the City of Ottawa an injunction, restraining protesters from setting unlawful fires, discharging fireworks, causing noise or idling vehicles.

STORY CONTINUES BELOW

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Ontario announces an end to most pandemic restrictions, including vaccine passports by March 1, following similar moves by Alberta and Saskatchewan.

Trucks were coming and going at the Coutts border crossing in this protest file photo. PHOTO BY DARREN MAKOWICHUK / POSTMEDIA NETWORK

Tuesday, Feb. 15

Police Chief Sloly's sudden resignation is accepted by the Ottawa Police Services Board. "Frankly," Deans says, "the response to the crisis so far has been ineffective at bringing this occupation to an end."

Ottawa Police Association President Matt Skof says "there's been a serious lack of direction provided front-line officers."

Sloly is replaced by interim Chief Steve Bell.

The border blockade in Coutts, Alta. ends peacefully with the departure of protesters one day after the RCMP arrest 13 people and seize a cache of firearms and ammunition.

STORY CONTINUES BELOW



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One-Week Pass

Wednesday, Feb. 16

The protest enters its 20th day in Ottawa with police handing out leaflets to downtown protesters, warning them to leave the area immediately or face arrest.

A vote by Ottawa city council removes Deans as head of the police services board after the board hires a new, interim chief, Matt Torigian, formerly of the Waterloo Regional Police Service. Outraged at Deans' treatment and convinced the board is being used as a political scapegoat, Coun. Rawlson King and Coun. Carol Anne Meehan resign their seats on the board, along with community member Sandy Smallwood.

They're replaced by Coun. Jeff Leiper and former board chair, Coun. Eli El-Chantiry, and community member Suzanne Valiquet.

Coun. Diane Deans. PHOTO BY ERROL MCGIHON /Postmedia

Thursday, Feb. 17

STORY CONTINUES BELOW

Ottawa police and other services secure a perimeter around downtown, and begin to make arrests. Among those taken into custody are protest organizers Tamara Lich and Chris Barber, both charged with counselling others to commit mischief.

El-Chantiry is elected as the new chair of the police services board. Torigian officially withdraws from the contract he signed to become the new, interim police chief, saying the job is impossible without the backing of Ottawa city council.

Deans accuses Watson of orchestrating her ouster in retaliation for her refusal to support his negotiations with protesters.

Downtown restaurants join the class action lawsuit, raising its damages claim to \$306 million.

Friday, Feb. 18

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A massive, complicated police operation unfolds in downtown Ottawa to remove the three-week old phalanx of trucks and protesters from city streets. The operation begins on the far edges of the protest, near Nicholas Street. Police say it will take days to complete. Lines of riot police advance slowly toward Wellington Street, telling protesters to leave or face arrest.

Tow trucks begin to remove the trucks left behind.

Protest organizer Pat King is arrested as he livestreams events from Ottawa.

Police make 70 arrests and tow 21 vehicles by late afternoon.

READ MORE COVERAGE OF THE ANTI-VACCINE MANDATE PROTEST IN DOWNTOWN OTTAWA

- [“Freedom Convoy” leader Pat King arrested live on social media](#)
- [‘You can’t be well without feeling secure’ — The cost of occupation on mental health](#)
- [Egan: Jim Watson and the practice of politics most cruel](#)
- [Former police board chair Diane Deans says she was ousted for not backing mayor’s protester negotiations](#)
- [Class-action complainant alleges trucker threatened her by backing pickup onto sidewalk](#)
- [Convoy class action claim increased to \\$306M as downtown restaurateurs join lawsuit](#)
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THIS WEEK IN FLYERS

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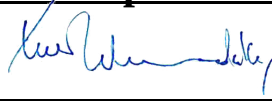
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Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

February 19, 2022
Ottawa, Ontario

Today, Prime Minister Justin Trudeau convened the seventh meeting of the Incident Response Group where ministers and senior officials provided updates on the current situation and an assessment of the progress being made under the *Emergency Measures Regulations* and the *Emergency Economic Measures Order* under the *Emergencies Act*. It was reemphasized that the scope of the measures will be time-limited, as well as reasonable and proportionate to the threats they are meant to address.

The group acknowledged the important work of Parliamentarians in the House of Commons as it resumed debate today on the government's decision to invoke the *Emergencies Act* as significant enforcement actions were taking place in front of Parliament Hill.

The group was briefed on the ongoing efforts by police in Ottawa, where law enforcement agencies from across Canada have worked together using a strong and measured approach to restore order in the city's downtown core. They recognized the efforts of the police forces, who have worked around-the-clock to end the occupation. Their work has resulted in at least 170 arrests, several charged and dozens of vehicles being towed since yesterday, including some blockades being removed.

The group discussed the announcement earlier today of an investment of up to \$20 million to provide non-repayable contributions to Ottawa businesses who have suffered losses due to the illegal blockades and occupations. They noted the significant costs to Canadians caused by these illegal blockades – from policing costs to disruption of our supply chains due to blockades at ports of entry. They were also provided with an update on the progress in implementing finance-related measures under the *Emergency Economic Measures Order*. It includes the freezing of 113 financial products, the disclosure of 47 entities, 251 Bitcoin addresses have been shared with virtual currency exchangers, and one financial institution proactively freezing the account of a payment processor to a value of \$3.8 million.

The group was briefed on the work being done by other federal government organizations, as well as efforts underway across the country to avoid further blockades, including at the Pacific Highway border crossing in British Columbia and at Prescott, Ontario. They reconfirmed the goal to bring a safe end to these illegal blockades and occupations and see order restored as soon as possible to ensure the safety of Canadians and an end to the economic disruptions.

The Prime Minister and ministers were also briefed on the latest intelligence assessment in relation to the situation in and around Ukraine by General Wayne Eyre, the Chief of the Defence Staff, and on the delivery of Canada's lethal military aid that arrived today in Ukraine. They also noted the G7 Foreign Ministers' statement today that called on Russia to choose the path of diplomacy, to de-escalate tensions, to substantively withdraw military forces from the proximity of Ukraine's borders and to fully abide by international commitments. They emphasized that any further military incursion into Ukraine would have severe costs and consequences, including through coordinated sanctions.

Associated links

- Prime Minister Justin Trudeau convenes the sixth Incident Response Group meeting on the illegal blockades and occupations (<https://pm.gc.ca/en/news/readouts/2022/02/18/prime-minister-justin-trudeau-convenes-sixth-incident-response-group>)
- Government of Canada invests up to \$20 million to support downtown Ottawa businesses impacted by demonstrations (<https://www.canada.ca/en/economic-development-southern-ontario/news/2022/02/government-of-canada-invests-up-to-20-million-to-support-downtown-ottawa-businesses-impacted-by-demonstrations.html>)
- Statement by G7 Foreign Ministers on Russia and Ukraine (<https://www.canada.ca/en/global-affairs/news/2022/02/statement-the-by-g7-foreign-ministers-on-russia-and-ukraine.html>)
- Federal government declares a public order emergency under the *Emergencies Act* to end disruptions, blockades, and the occupation of the city of Ottawa (<https://www.canada.ca/en/public-safety-canada/news/2022/02/federal-government-declares-a-public-order-emergency>)

emergency-under-the-emergencies-act-to-end-disruptions-blockades-and-the-occupation-of-the-city-of-ottawa.html)

- Canada invokes the *Emergencies Act* to limit funding of illegal blockades and restore public order
(<https://deputypm.canada.ca/en/news/news-releases/2022/02/15/canada-invokes-emergencies-act-limit-funding-illegal-blockades-and>)

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Canada • Analysis

The Ottawa convoy has 'shattered norms' for protest in Canada. Will we see more of it?

Occupying a part of the capital has gotten Canadians' attention but also lost their support, poll suggests

[Stephanie Hogan](#) • CBC News • Posted: Feb 19, 2022 4:00 AM ET | Last Updated: February 19



The protest organizers call the Freedom Convoy in downtown Ottawa, seen Feb. 14, has succeeded in getting Canadians' attention but also losing their support, a poll suggests. Tactics have been likened to an occupation holding residents hostage. (CBC/Radio-Canada)

The scenes that unfolded in downtown Ottawa over the past three weeks have been described by people living there as [disruptive and frightening](#). For people right across the country, they've also been eye-opening.

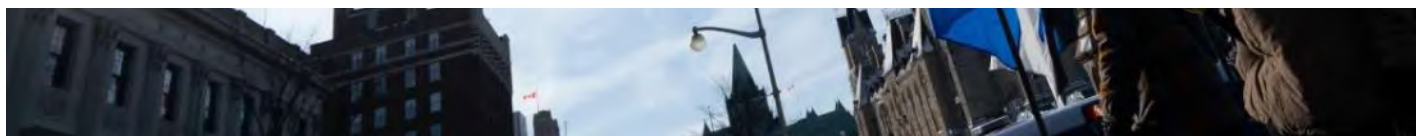
Anyone who thought this kind of dug-in, angry occupation of streets in a capital city would never happen in Canada was proven wrong by how quickly and easily Ottawa was brought to a standstill by the so-called Freedom Convoy.

What's more, as the days of diesel-spewing truck idling and intrusive horn-honking went on, there has been disbelief at how little anyone seemed willing — or able — to do. Peter Sloly [resigned as Ottawa police chief on Tuesday](#), after days of criticism over how the convoys were handled from the beginning.

The seeming [paralysis of the Ottawa police](#), the [lack of early intervention](#) from the premier and the [political posturing over substantial action at the federal level](#) to deal with the weeks-long blockade of the streets have led to speculation that the convoy's tactics could become the new norm.

Experts, including some who have spent time in the crowds, say the occupation will probably have some lasting effects, but it is unlikely to become the new face of protest.





Thousands of people first descended on Parliament Hill on Jan. 28. In the ensuing days and weeks, trucks and people dug in, occupying and blocking streets around Parliament Hill. (CBC / Radio-Canada)

Shattered norms

It's not known why Ottawa police allowed the convoy protesters to set up where they did in the downtown core or expected them to leave after a few days.

But Regina Bateson, who studies human rights and the political consequences of conflict and violence, says that's a key question.

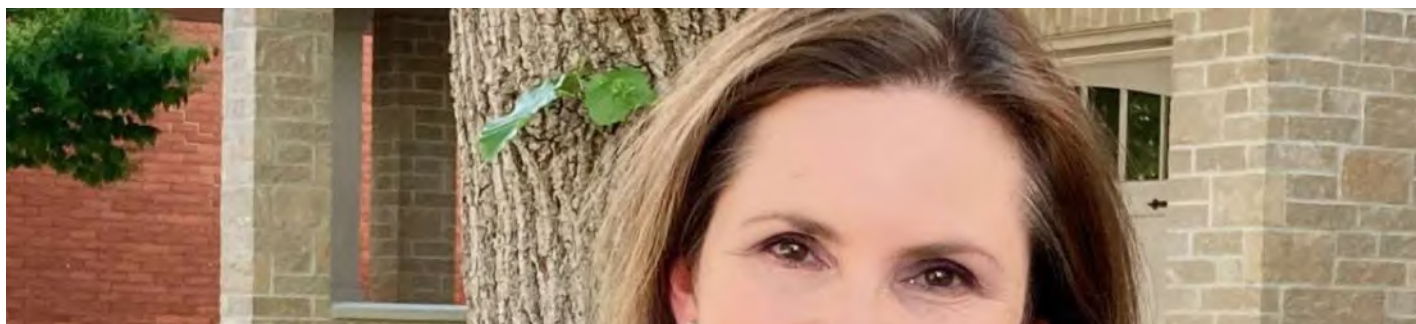
"I think there needs to be a very active look at what role racial bias or preference may have played in how the group was initially assessed and why they were deemed to be not particularly threatening, even though they clearly are," she said.

"Other protesters, in particular Black and Indigenous groups have been treated much more harshly in the past."

Bateson, an assistant professor of public and international affairs at the University of Ottawa, said the events that unfolded in Ottawa have "shattered norms" and that the participants have established new tactics and "pushed the envelope of the possible in Canada."

"What we've seen in Ottawa is something that had elements of a protest to start with, that then morphed into an illegal occupation, that now has significant foreign involvement, as well as more organized militia-style activity happening," she said.

She believes other groups are unlikely to succeed if they decide to emulate their tactics.





'What we've seen in Ottawa is something that had elements of a protest to start with, that then morphed into an illegal occupation,' said Regina Bateson, assistant professor at the University of Ottawa. (Vivek Krishnamurthy)

Protests generally involve the gathering of people to express a collective disagreement about a government policy or something going on in society.

The Anti-Defamation League [cites a number of goals a protest can have](#), including to influence public opinion, draw attention to and share information about a perceived injustice or gain a wider audience for the cause.

Sometimes protesters do break laws in the course of their actions.

- **TIMELINE** [The convoy crisis in Ottawa: A timeline of key events](#)
- [From snakes to Spartans: The meaning behind some of the flags convoy protesters are carrying](#)

"They have some sense that there are laws, that they may try to disturb a bit, but they know they're breaking the law," said Joao Velloso, associate professor at the University of Ottawa's faculty of law. "When an Indigenous group is blockading a train from passing, they're going to tell you that they're breaking the law to achieve a certain thing."

Velloso spent several days in the streets of Ottawa during the truck blockade, speaking to the people who were part of it.

"Most of these guys downtown, they don't believe they are breaking the law," he said.

Prior to the police moving in on the occupation Thursday evening, at least [25 people had been arrested](#). As of Friday evening, more than 100 people had been arrested, [including organizers Chris Barber and Tamara Lich](#).

Velloso described what happened in Ottawa as akin to holding people hostage.



University of Ottawa associate professor Joao Velloso spent several days in the streets speaking to members of the convoy. He says they told him they were not breaking the law, but acting the best interest of Canadians. (David Richard/CBC-Radio Canada)

Loss of public support

If the goal was to influence public opinion, the convoy members lost the support of the general public pretty quickly.

An [Angus Reid poll out this week](#) suggests nearly three-quarters of Canadians (72 per cent) believe the convoy members should go home. Further, 44 per cent of those polled said they are now more likely than before the convoy action to support vaccine requirements at the Canada-U.S. border and indoor mask requirements in their communities.

Colleen Coffey has been organizing and taking part in protests for more than 30 years, most recently as Atlantic Regional Executive Vice-President for the Public Service Alliance of Canada.

"I probably have broken the law more than once," she said. "But not in such a way that I was going to cause harm to any individual or group of people."

She said she has always operated from the position of "you make your point, and that's it. And it's not about hatred or inflicting suffering on people."

Colleen Coffey, who has been organizing and taking part in protests for decades, says they have never been about hatred or inflicting suffering on others. (Submitted by Public Service Alliance of Canada)

By contrast, observers suggest some convoy members in Ottawa aimed for that — from [attacking those wearing masks](#) to [relentless honking](#) to [desecrating the National War Memorial](#).

Bateson recalled a video that circulated of one member in particular, who was angry about COVID-19 vaccine mandates.

"His rationale for why they were blowing the horns was to make other people suffer the way he had already suffered. So it was actually a rationale of retaliation and not about, like, expressing

anger to authorities."

And the problem, she said, was that police failed to act promptly.

WATCH / How the convoy is forcing the end of some relationships:



Unfriended: Protest convoys create rifts with family, friends

2 months ago | 2:11

As deeply divisive pandemic protests continue across the country, some Canadians say it's taking a toll on their relationship both on and off social media. 2:11

'A fundamental epic failure'

"Nothing really went right here," said Christian Leuprecht, a professor at Royal Military College and Queen's University in Kingston, Ont.

The security expert says there was clear failure by all three levels of government when it came to preparing and dealing with the onslaught of trucks.

"A modern state has three basic functions: security, prosperity, democracy," he said. "If you don't have security and safety for your population, you won't have a prosperous country and you won't have a democratic country."

"And what we see in Ottawa is a fundamental epic failure of all levels of government to provide for the most basic function of the modern state."

Security expert Christian Leuprecht, a professor at the Royal Military College of Canada, says there was a clear failure to act on the convoy from all three levels of government. (Submitted by Christian Leuprecht)

Leuprecht said the problem runs even deeper than simply police inaction.

"From the beginning, we have people thumbing their noses at the rule of law and the Constitution and our democratic institutions. Making claims they want to bring down the prime minister," he said. "Clearly seditious type of activity among a minority — or perhaps a majority of the protesters, who knows? But the state was nowhere to be seen."

Leuprecht said a much heavier-handed approach should have been used from the onset, and warns what happened did not escape notice abroad.

"You can also bet that our adversaries in Moscow and Beijing and elsewhere are also watching, as well. How do you bring down Canadian democracy and disrupt Canadian democracy? Support a few fringe groups that resort to unlawful protest measures."

Wellington Street seen on Feb. 14 still lined with trucks, after city officials negotiated to move some trucks towards Parliament and away from downtown residences. (Justin Tang/The Canadian Press)

Leuprecht thinks the intelligence as the convoy was approaching Ottawa was flawed, and only concerned with a certain type of extremist group.

"For 20 years, we've been so singularly focused on jihadi terrorism," he said.

"Imagine if instead of that Confederate flag, that would have been an ISIS flag carried by a guy in a beard who identifies publicly as Muslim," he said. "Do you think the enforcement might have been just a tad different?"

- [**Federal government invokes Emergencies Act for first time ever in response to protests, blockades**](#)

He says there should be a Royal Commission to figure out exactly what went wrong in Ottawa and to ensure it never happens again.

"Our law enforcement and national security system came under limited stress by a few thousand protesters, and the system completely collapsed, as far as I can tell," he said.

"That suggests to me we need a complete overhaul of our institution, of our capabilities, of our legislation. The system is not working."

WATCH / Why the government says it needed the Emergencies Act to dismantle the convoy:



Why the government invoked the Emergencies Act

1 month ago | 2:38

Emergency Preparedness Minister Bill Blair talks to Ian Hanomansing about why it was necessary to invoke the federal Emergencies Act to try to end the protests. 2:38

Angus Reid surveyed 1,622 Canadian adults online from Feb. 11-13, 2022 who are members of [Angus Reid Forum](#). The margin of error of is +/- 2.5 percentage points, 19 times out of 20.

Clarifications

- In the original version of this story, a quote attributed to Regina Bateson contained an incorrect word ("real"). It said, "I think there needs to be a very active look at what real racial bias or preference may have played in how the group was initially assessed..." In fact, Bateson said, "I think there needs to be a very active look at what role racial bias or preference may have played in how the group was initially assessed..."

Feb 19, 2022 11:11 AM ET

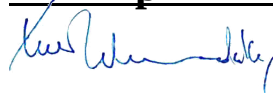
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**Canada**

[Royal Canadian Mounted Police \(https://www.rcmp-grc.gc.ca\)](https://www.rcmp-grc.gc.ca)

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Update: Law enforcement activity continues near the Pacific Highway Border Crossing

Surrey

2022-02-19 12:07 PST

Surrey RCMP is providing an update on the situation near the Pacific Highway Border Crossing as of Saturday February 19, 2022.

The border is open to and accessible to the public. Due to ongoing protest activity in the area, police will be conducting vehicle check stops and non-local vehicles may be diverted.

Check stops are in place on all routes providing access to the Pacific Highway Border crossing. Police are recommending that cross-border travelers and commercial vehicle traffic use alternate border crossings.

Surrey RCMP is aware and continuously monitoring the protest activity that has been allegedly planned for today in the area of the Pacific Highway Border Crossing. While police respect the right to protest, enforcement will be taken in the event protest activity becomes unlawful.

Surrey RCMP is working with provincial and federal RCMP units, the Canada Border Services Agency, and is receiving assistance from numerous police detachments.

Further updates will be provided as needed throughout the day.

For media inquiries contact:

Sgt. Elenore Sturko

Media Relations Officer

Surrey RCMP Media Relations Unit

Email: surrey_media_relations@rcmp-grc.gc.ca

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Update - Pacific Highway Border Crossing

Surrey

2022-02-19 12:30 PST

Due to increased protest activity in the area, 176 Street is currently closed to all traffic from 8th Avenue.

As a preventative measure, and to help ensure public and officer safety, vehicle and pedestrians cannot access the Pacific Highway Border Crossing at this time. The public are advised to use alternate border crossings during this service disruption until further notice.

Police are continually monitoring the latest information about potential protest activity, including a number of vehicle convoys travelling to the area.

Further updates will be provided as needed throughout the day.

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Royal Canadian Mounted Police (<https://www.rcmp-grc.gc.ca>)

[Home](#) → [B.C.](#) → [Surrey](#) → [Newsroom](#)

Update: Police investigating after members of the media swarmed by protesters in Surrey

Surrey

2022-02-19 17:07 PST

Surrey RCMP is aware of several incidents from earlier today involving a group of aggressive protesters who surrounded members of the media. Police intervention was required due to the actions of the protesters, and to ensure that media members had safe passage to their vehicles.

Police will be following up with the reporters and camera people involved to gather their full accounts, including the collection of any video evidence.

“These kinds of acts of aggression and intimidation towards media, or any member of the public, are simply unacceptable,” says Sgt Elenore Sturko. “While it is not always safe for our officers to take immediate enforcement action at the time of the alleged offences based on the size of the crowd of protesters, these incidents will be fully investigated and could lead to subsequent arrests or charges.”

For media inquiries contact:

Sgt. Elenore Sturko

Media Relations Officer

Surrey RCMP Media Relations Unit

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Update: Protesters depart and roads re-open near the Pacific Highway Border Crossing

Surrey

2022-02-19 20:45 PST

Surrey RCMP is updating the public on the current situation at the Pacific Highway Border Crossing.

As of 8 pm on February 19, 2022, the vast majority of protesters and vehicles have now departed the area. A small group of protesters remain at the corner of 176 Street and 8th Avenue, on the sidewalk.

Traffic is now moving on 176 Street in all directions and the public can access the border crossing. Vehicle road checks will remain in place.

Police will be maintaining a large presence throughout the evening, with a continual assessment of the situation.

Investigations remain underway into unlawful activity earlier in the day. This includes reports of intimidation and alleged assault against members of the media ([see previous news release \(https://surrey.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2126&languageId=1&contentId=73553\)](https://surrey.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2126&languageId=1&contentId=73553)).

“It’s been a very busy day for our teams on the ground, and those supporting operations from behind the scenes,” says Sgt Elenore Sturko. “Our work here is not done though, and the public can expect a continued police presence in the days and nights ahead.”

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Nur Muhammed-Ally, Counsel

February 20, 2022
Ottawa, Ontario

Today, Prime Minister Justin Trudeau convened the eighth meeting of the Incident Response Group where ministers and senior officials provided updates on the current situation and an assessment of the progress being made.

The group was briefed on the ongoing efforts by police in Ottawa, where law enforcement agencies from across Canada have worked together to restore order in the Parliament Precinct and the city's downtown core. The group discussed the methodical and complex law enforcement effort that was carried out involving the Royal Canadian Mounted Police, the Ontario Provincial Police, and the Ottawa Police Service.

The group acknowledged the comments from the police today highlighting that this operation in Ottawa directly benefitted from the *Emergencies Act*, noting that provisions of the Act have allowed them to maintain the perimeter, restrict travel and ensure that they continue to restrict financial support and other assistance to protesters. Over the past few days, there have been close to 200 arrests, 389 criminal charges have been laid and a total of 76 vehicles were towed. The job is not done yet and work is expected to continue to bring an end to the illegal blockades and occupations.

The group was briefed on the law enforcement actions being taken elsewhere in Canada to avoid further blockades and protect jobs and the economy. They reconfirmed the goal to see order restored as soon as possible to ensure the safety of Canadians, as well as to continue to assess the use of the *Emergencies Act* to ensure that, as intended, it is time limited, reasonable, and proportionate to the threats it is meant to address.

Associated links

- Prime Minister Justin Trudeau convenes the seventh Incident Response Group meeting on the illegal blockades and occupations (<https://pm.gc.ca/en/news/readouts/2022/02/19/prime-minister-justin-trudeau-convenes-seventh-incident-response-group>)
- Blockades news (<https://blockade.rcmp.ca/index-en.html?fe>)

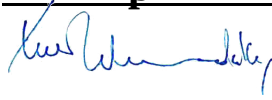
- Canada invokes the *Emergencies Act* to limit funding of illegal blockades and restore public order
(<https://deputypm.canada.ca/en/news/news-releases/2022/02/15/canada-invokes-emergencies-act-limit-funding-illegal-blockades-and>)
- Federal government declares a public order emergency under the *Emergencies Act* to end disruptions, blockades, and the occupation of the city of Ottawa (<https://www.canada.ca/en/public-safety-canada/news/2022/02/federal-government-declares-a-public-order-emergency-under-the-emergencies-act-to-end-disruptions-blockades-and-the-occupation-of-the-city-of-ottawa.html>)

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POLITICS

Letter shows Alberta asked for feds' help with Coutts blockade as Kenney claims province had resources

By [Jessika Guse](#) • Global News

Posted February 20, 2022 7:42 pm ▾



WATCH ABOVE: A letter obtained by Global News shows the Alberta government asked the federal government for help with the Coutts border blockade. The new details come as Premier Jason Kenney continues to insist publicly that Alberta had all the tools that it needed. Kim Smith reports – Feb 20, 2022



-A A+

Roughly a week after protesters started to gather in large numbers at the [Coutts](#) border crossing, Alberta's minister of municipal affairs sought assistance from Ottawa, Global News has learned.

The letter obtained by Global News shows [Ric McIver](#) penned the piece on Feb. 5 to both Minister of Public Safety [Marco Mendicino](#) and Minister of

Emergency Preparedness Bill Blair.

“As you are aware, Alberta is currently experiencing significant issues with the free movement of vehicles and supplies in southern Alberta with direct impacts to our largest border crossing with the United States,” the letter stated.

During the first week of February, [RCMP were unsure when protesters were going to leave](#) as a second blockade, further up Highway 4, had also started to grow.

READ MORE: [‘Threat still exists’: Emergencies Act to remain as long as required, Bill Blair says](#)

STORY CONTINUES BELOW ADVERTISEMENT

“Despite our best efforts to resolve this ongoing issue, the Royal Canadian Mounted Police have exhausted all local and regional options to alleviate the weeklong service disruptions at this important international border,” the letter read.

The letter said it was a collaborative effort by RCMP along with local and provincial officials to try and persuade the protesters to remove their vehicles — but that effort proved to be unsuccessful.

McIver also pointed out due to “negative consequences,” Mounties were unable to secure the proper equipment to remove the trucks, trailers and tractors that were stationed in the area.

“Attempts to procure these services with providers from across the western provinces and the United States have failed,” the letter said.

2:45

Weapons and ammunition seized at border blockade i...

Weapons and ammunition seized at border blockade in Coutts, Alberta – Feb 14, 2022

McIver asked for approximately 70 semi-tractor trailers and about 75 personal and recreational vehicles from the area to assist with the removal of the illegal blockade with the commitment that RCMP and other law enforcement partners would remove demonstrators and bystanders from the area prior to arrival.

STORY CONTINUES BELOW ADVERTISEMENT

“I and my colleague, the minister of justice and solicitor general, or our respective staff members, are available to discuss these requirements but am hopeful that Alberta’s request will be received favourably and responded to promptly,” McIver wrote.

Kenney remains against Emergency Act

The leaked letter comes after Alberta Premier Jason Kenney tweeted on Saturday he will be [launching a court challenge](#) against the federal government’s Emergencies Act.

“The federal government’s invocation of the Emergency’s Act is an unnecessary and disproportionate measure that can violate civil liberties,

invades provincial jurisdiction, and creates a very dangerous precedent for the future,” Kenney said in a video posted to his Twitter page.

READ MORE: [Alberta Premier Jason Kenney to launch court challenge against feds' Emergencies Act](#)

The premier said it's [essentially unnecessary](#) as “we’ve demonstrated here in Alberta, at Coutts” that provincial law enforcement was able to deal with illegal road blockades.

1:37

Kenney says federal Emergencies Act ‘not necessary’ i...

Kenney says federal Emergencies Act ‘not necessary’ in Alberta – Feb 14, 2022

More than two weeks after the Coutts blockade started, RCMP made numerous arrests along with confiscating weapons and ammunition. However, during that time, access to the U.S. border was limited or at a complete standstill due to the ongoing protest.

STORY CONTINUES BELOW ADVERTISEMENT

READ MORE: [RCMP arrest 13 people, seize weapons and ammunition near Coutts border blockade](#)

At one point, the Canadian Border Services Agency temporarily suspended entry at the Alberta-Montana border crossing.

Kenney insists Alberta had resources it needed

Justin Brattinga, the premiers' press secretary, responded to the question of why the province asked for help when the premier claimed on Saturday that "provincial law enforcement was able to deal with illegal road blockades."

Brattinga said the province originally asked for help from the federal government and RCMP at Coutts "in part because local Alberta RCMP remains under the control of the federal government. Ottawa denied our request."

"The Coutts situation required federal resources — not the use of legislation that suspends civil liberties," Brattinga added.

— with files from Kim Smith and Mercedes Stephenson, Global News

RELATED NEWS

- [Canada's public safety minister draws direct tie between Coutts, Ottawa protests](#)
- [Coutts blockaders discussed blocking airport cargo terminals: private threat assessment](#)
- [4 charged with conspiracy to murder after raid on Coutts blockade](#)

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COMMENTS

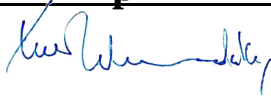
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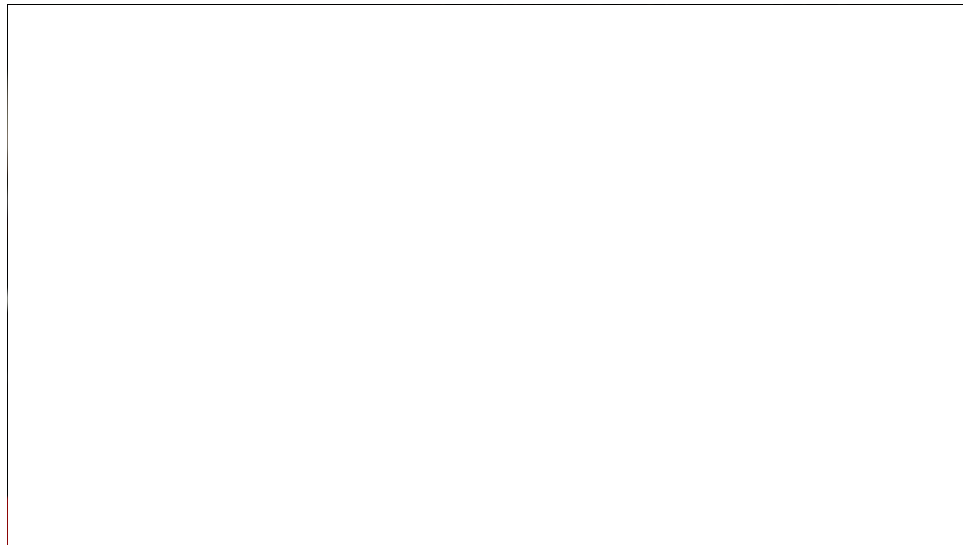
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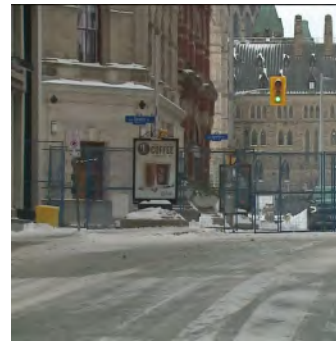
OTTAWA | News

False reports of woman's death at Ottawa protest example of misinformation, say police





Rumours of woman's death proven false



Police securing downtown



Ted Raymond

CTV News Ottawa Digital Multi-Skilled Journalist

[Contact](#)

Updated Feb. 20, 2022 12:14 p.m. EST

Published Feb. 20, 2022 9:27 a.m. EST

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A woman at the heart of a widely spread and false report of a trampling death amid the police operation to clear "Freedom Convoy" protesters from Ottawa streets Friday is very much alive, and Ottawa police say it's an example of the misinformation that has been spread throughout the three-week demonstration.

Police with Toronto's mounted unit moved through crowds Friday near the Chateau Laurier hotel in downtown Ottawa in an attempt to separate protesters from a line of police officers who were slowly advancing. As this happened, videos on social media showed two people falling to the ground as mounted officers rode through.

The incident [is now under investigation](#) by the Ontario Special Investigations Unit.

A short time after it happened, a tweet by a Fox News contributor with more than one million followers claimed a

contributor with more than one million followers claimed a woman involved in the incident died in hospital.

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- Here's what we know about the police operation to end the 'Freedom Convoy' occupation

This, however, is untrue. Family members said the woman involved suffered a broken clavicle. The false reports of her death were even joked about in [an Instagram video](#), as a voice asks the woman "are you alive?" and she smiles.

"She is alive presently resting in a good bed snoring," the video caption says.

Ottawa police and paramedics also confirmed that no one had died. Paramedic Chief Pierre Poirier said in a statement that 18 people were transported to hospital from the secure zone on Friday with non-life threatening injuries but no fatalities were recorded.

Ottawa Police 
@OttawaPolice



Please note: No one has been seriously injured or passed away in any of today's police actions. Safety is our priority.

~

Veuillez noter que personne n'a été gravement blessé ou est décédé en lien aux interventions policières d'aujourd'hui. La sécurité est notre priorité.

10:21 PM · Feb 18, 2022



The reporter who sent out the tweet claiming incorrectly that someone died [did eventually admit her report was wrong](#), but millions of people had seen the tweet by then. It had received more than 14,000 retweets and more than 15,000 likes before it was eventually deleted on Saturday.

Interim Ottawa Police Chief Steve Bell told reporters Saturday it was an example of misinformation that they were doing their best to refute.

"When you talk of misinformation, that's specifically one of the demonstrations for us of that," Bell said.

Bell explained that the crowd was growing tense Friday afternoon until members of the mounted unit rode through the crowd to create a separation between police and protesters.

"Almost immediately, there was tweets, there was pictures that had been photoshopped out on social media that indicated people had died as a result of that," Bell said.

"What I can indicate is there was two members of the protesters who did collide with the horses. They fell down. They immediately got back up and started to again engage in their protest and demonstration activity."

Bell's "photoshop" claim appears to stem from images purporting to show a real Ottawa police tweet regarding the

alleged throwing of a bicycle at one of the horses, but edited to appear as if it included a photo of the aftermath of movement of the mounted unit, where a woman's walker can be seen on the ground. The doctored image was used to cast doubt on police claims that a bicycle was thrown at a horse.

The actual Ottawa Police Service tweet about the alleged bicycle-throwing incident did not include a photo.



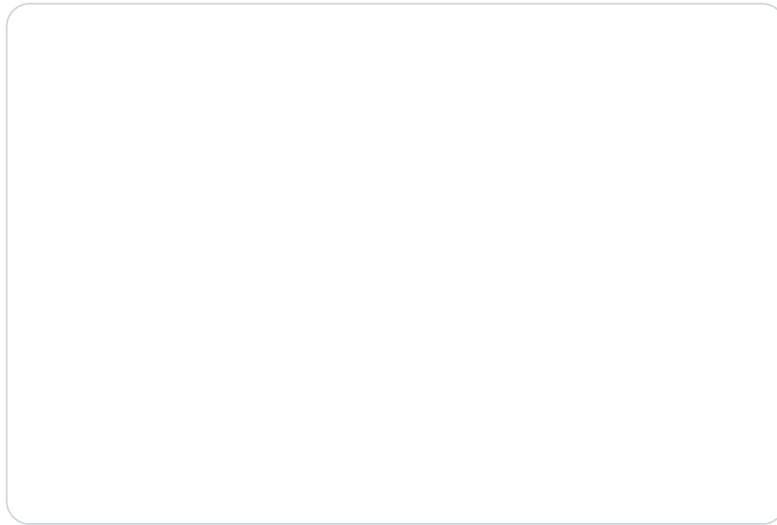
Bell did not give specifics about the incident when asked about it on Saturday.

"We'll have to get more specific information on that for you and I'll be able to provide more in the coming days," he said.

Police on Twitter claimed the horse was tripped but unharmed.



We're unaware of any injuries. A bicycle was thrown at the horse further down the line and caused the horse to trip. The horse was uninjured.



8:33 PM · Feb 18, 2022



11.6K



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Police have made 191 arrests since Friday's operation to remove demonstrators began. A large police presence remains in the downtown core Sunday.

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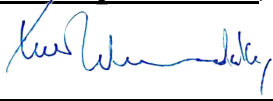
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Update on Police Operations to Remove Unlawful Protesters

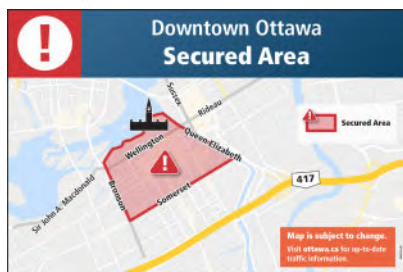
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Updated Secured Area map

FOR IMMEDIATE RELEASE: Monday, February 21, 2022 4:20pm

(Ottawa)— The Ottawa Police Service and its policing partners continue operations to return the Downtown Core to a state of normalcy.

Secure Area Footprint Reduced

Police have reduced the size of the Secured Area. It now includes:

- Somerset Street West to Parliament Hill
- Bronson Avenue to the Rideau Canal

The ByWard Market area is no longer in the Secured Area.

Residents and Businesses – what to expect on Tuesday

Residents can expect an increased police presence to remain in place in the coming days.

Residents may travel to the secured area if they have a lawful reason such as they live there, work there or are shopping and visiting businesses.

Police checkpoints will remain in place and you will be asked your reason for travelling within the area.

Businesses should feel safe to reopen if they had closed during the unlawful protest.

The Ottawa Police is working directly with local business improvement agencies.

Supporting local businesses is considered lawful if you are entering the Secured Area.

We would like to thank businesses and residents for their patience.

Police measures will only remain in place as long as is deemed necessary to ensure unlawful protesters do not return.

Unlawful protesters must not enter the area or they may be subject to arrest and charges.

Some unlawful protesters returned to the protest site after being arrested and they have been charged.

A Quebec man was arrested on February 18th for Obstruct Police, Mischief Obstruct Property and Mischief. He was released with no charges. One day later he was arrested for Disobey lawful order, Obstruct Police, Mischief Obstruct Property and Mischief and was released via undertaking with boundary conditions.

A woman from Southern Ontario was arrested on February 18th for Mischief. She was released with no charges. One day later, she was arrested for Disobey lawful order, Obstruct Police, Mischief Obstruct Property and Mischief and was released via undertaking with boundary conditions.

Enforcement and Charges Laid

As of 8:00 AM on February 21st, police have made 196 arrests.

Of those persons arrested, 110 were charged with various offences, including:

- Disobey Lawful Court Order
- Obstruct/Resist A Peace Officer
- Assault
- Mischief Obstruct Property
- Mischief
- Cause disturbance by Fighting/Shouting/Swearing
- Assault Police

- Dangerous Operation Motor Vehicle
- Possess Weapon

A total of 115 vehicles have been towed to date.

- 30 -

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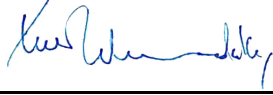
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Sparks St. Now Open to Pedestrians - Secure Area Further Reduced

Posted On Tuesday February 22, 2022

Like 5

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FOR IMMEDIATE RELEASE: Tuesday, February 22, 2022 3 pm

(Ottawa)— The Ottawa Police Service and its policing partners continue operations to return the Downtown Core to a state of normalcy.

Sparks Street is now accessible to pedestrians via a gated access at all intersections except Elgin Street.

Secured Area Reduced

Police are reducing the size of the Secured Area. It now includes:

- Laurier Avenue to Parliament Hill
- Bronson Avenue to the Rideau Canal

Police measures will only remain in place as long as is deemed necessary to ensure unlawful protesters do not return.

- 30 -

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**FOR IMMEDIATE RELEASE: Monday, February 21, 2022
4:29pm**

Update on Police Operations to Remove Unlawful Protesters

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- Dangerous Operation Motor Vehicle
- Possess Weapon

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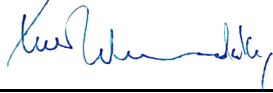
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Nur Muhammed-Ally, Counsel

Revocation of the Emergencies Act

 February 23, 2022

Statement

 Ottawa, Ontario

On February 23, 2022, the declaration of a public order emergency under the *Emergencies Act* was revoked.

The Royal Canadian Mounted Police (RCMP) remains committed to working with our law enforcement partners to ensure the safety and security of Canadians.

The Integrated Command Centre comprising the Ottawa Police Service, the Ontario Provincial Police and the RCMP will remain activated for an indeterminate amount of time, furthering the collaborative efforts that have taken place to date.

The RCMP will continue to actively and closely follow the situation related to the various illegal protest activities across Canada, keep a constant state of preparedness and have scalable resources available if needed.

The revocation of the public order emergency takes nothing away from our resolve to effectively enforce the law and keep communities safe.

–30–

Date modified:

2022-02-24

Enforcement under the Emergencies Act – Unfreezing of accounts

 February 23, 2022

Statement

 Ottawa, Ontario

The *Emergencies Act* has allowed law enforcement and monitoring agencies to work more closely with Canadian financial institutions; which has enhanced the effectiveness of law enforcement's investigations pertaining to the illegal convoy protests.

The RCMP and its policing partners used the Emergency Economic Measures Order to strongly encourage individuals to leave the illegal protests and deter them from counselling others to commit criminal offences.

The RCMP provided relevant information to financial institutions, who have the onus to determine which financial products should be frozen, pertaining to entities (i.e. individuals or companies) believed to be involved in illegal acts. As previously stated, at no time did the RCMP disclose information on donors or on those who purchased merchandise.

As of February 21, 2022, the RCMP has gone back to financial institutions with some updated information about certain entities whose status may have changed pertaining to the illegal protest activity. This new information can be assessed alongside all other information to help inform decisions to unfreeze certain accounts.

–30–

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CANADA

Was it really about vaccine mandates — or something darker? The inside story of the convoy protests

A Canadian protest movement appeared to be fuelled by opposition to COVID-19 restrictions, but conspiracy theories swirled just below the surface.

By **Justin Ling** Special to the Star

Sat., March 19, 2022 | ⌚ 19 min. read

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[READ THE CONVERSATION \(283 \)](#)

For three weeks this winter, a so-called “Freedom Convoy” delivered thousands of demonstrators into downtown Ottawa, turning them into an occupying force that snarled daily life in the nation’s capital and dominated the national conversation.

But who were the demonstrators, really — and what were they after?

Many of them positioned the protest as a fight against vaccination mandates for cross-border truckers. Others saw it as a campaign against pandemic restrictions more broadly. No doubt the occupation was many things to many people. But for several of its organizers, the protest was the culmination of years of work, their best chance yet to coalesce a movement around their preferred conspiracy theories and a violent anti-government ideology.

The convoy protest was not about just the pandemic. But nor could it have happened without the pandemic. Organizers were able to leverage fatigue and frustration with government restrictions and social isolation to grow their movement, drawing on one particularly potent conspiracy theory in the process: the idea that an international cabal has taken control of Canada, and is weaponizing the pandemic to consolidate its dominance. This occupation was marketed as the last stand to stop tyranny — and has become a global rallying cry for a burgeoning anti-media, anti-science, anti-government political force.

Remarkably, the occupation was ended without major incident. Normalcy has returned to downtown Ottawa: Commuters sit in slow, but not frozen, traffic. Politicians bustle through Centretown on their way to the House of Commons. Journalists roam freely, without hired security in tow.

The nation’s capital is back to its famously boring self.

But it’s an unsettled peace. Where has the movement — and its anger — gone? And what comes next in its plan to stop the globalist takeover of Canada?

In a sense, the story begins more than a year before the pandemic.

In a video posted to his Facebook page, James Bauder is standing in a snow-covered parking lot in Thunder Bay, pointing his phone camera at the assembled convoy. There is a pickup truck with its bed full of red jerry cans. A small group of people mills about in reflective yellow vests, brandishing a Canadian flag. Cars and semi trucks are covered in homemade signs.

“Everybody in Canada is involved in this,” Bauder told his Facebook friends. “We got people across our great nation travelling to go to Ottawa to stand up for Canada unity.”

When it arrived in Ottawa, their convoy gathered at Parliament Hill, where the protesters demanded a say in how the country was governed. “I brought myself a pink slip,” organizer Pat King said in an interview, “and I would like to hand it to Mr. Trudeau.”

The convergence on Ottawa for two days in January 2019, dubbed “United We Roll,” was moderately successful, attracting the support of Conservative party leader Andrew Scheer and collecting more than \$140,000 through an online fundraising campaign.

A few months later in Medicine Hat, Alta., Benjamin Dichter stood at an event to introduce a man who bills himself as a top intelligence analyst and whom Dichter, in a comparison to novelist Tom Clancy’s fictional CIA agent, called “Canada’s Jack Ryan.”

When he took the stage, Tom Quiggin described a plot between Islamists and socialists to control Western governments. Prime Minister Justin Trudeau, he warned, was the apex of that “entryism.”

“If he is re-elected this fall, and he does not immediately disavow his previous commitments to globalism and Islamism, he will then be pouring gasoline on the already burning embers of discontent,” Quiggin warned audience members including Tamara Lich, who had helped organize the event.

Quiggin touted his speaking tour as an urgent call to resist this encroaching new world order. (In a 2019 podcast, he would warn that Trudeau could usher in an era in which “widespread civic violence occurs or, in the worst-case scenario, a sort of civil war.”)

But there was another pressing reason for it: money. Quiggin was raising funds to fight a defamation lawsuit launched after he accused prominent Canadian Muslims of being the clandestine leadership of the Muslim Brotherhood, which Quiggin alleges is a terror organization. The lawsuit is ongoing; a GoFundMe campaign set up by Dichter has so far raised more than \$42,000 to fund his defence.

As a conspiracy theorist, Quiggin was convinced that something was rotten in Ottawa. He wasn’t the only one.

Norman Traversy then invoked the rallying cry of QAnon, the American conspiracy theory movement that claims Satanic pedophiles have infiltrated the U.S. government. “Where we go one ...” he shouted to those assembled. “We go all!” the crowd shouted back.

Standing directly behind him was King, who would go on to become a public face of the protesters.

The next day, Corey Hurren posted a meme to his Instagram account falsely alleging that Microsoft founder Bill Gates and the Switzerland-based World Economic Forum were complicit in creating COVID-19. Half an hour later, Hurren drove a truck loaded with guns through the front gates of Rideau Hall, an apparent attempt of removing the prime minister from power. Hurren would later plead guilty to eight charges.

In 2021, James Bauder would find a way to pull these strands together.

The World Economic Forum provided a perfect target.

The organization hosts an annual retreat in Davos, Switzerland where members of the political, business and cultural elite gather to promote liberal economic policies and recognize the leaders who champion their progressive capitalist values. The Forum has been led by its founder, Klaus Schwab, for a half century.

But in an information universe where institutions are presented as corrupt and malign, critics have coloured its mission with an ominous hue. Along with the United Nations and the World Health Organization, conspiracy theorists have baselessly alleged the WEF is complicit in releasing COVID-19 into the world to enact mass control, open borders, and the imposition of a Chinese-style digital surveillance establishment. In essence: Totalitarianism.

Bauder wrote on Facebook that Trudeau “needs too (sic) be arrested and charged for treason, and for participating in committing crimes against humanity” and warned that it was nearly too late to stop the World Economic Forum’s devious plan: “WE HAVE BEEN LEAD (sic) RIGHT INTO A TRAP. A few more moves and it’s checkmate, Game Over.”

Pat King’s presence was also increasing on social media, where he warned his followers, “There’s an endgame: It’s called depopulation of the Caucasian race.” Dichter had become increasingly involved in the People’s Party of Canada, the right-leaning

political party founded by former Conservative MP Maxime Bernier, and warned the Ontario Legislature of a “gradual Islamization of Canada by erasing its national identity.”

They’d had enough.

“Truckers,” Bauder wrote on Facebook in August 2021, “wanna make some noise?”

In the months that followed, Bauder came up with the idea for Operation Bear Hug, a plan modelled after the United We Roll convoy. He would recruit a veritable army of patriots to head to the capital and surround it — in protest of COVID-19 vaccination mandates, masks, vaccines and the violations of personal freedoms he claimed they represented. He started an organization to advance the plan: Canada Unity.



If the problem was a global conspiracy, then the solution had to be more than just talk. Bauder was seeking real change. He began touting a so-called “memorandum of understanding” that detailed the protest’s objectives. “By having the Senate of Canada and the Governor General of Canada sign this MOU into action, they agree to immediately cease and desist all unconstitutional, discriminatory and segregating actions and human rights violations,” it read. Failing action from the Governor General and the Senate, Bauder said, signatures would be collected to trigger a national vote to remove the government. “So this is just step one of calling for a referendum through Elections Canada,” he said in a livestream.

The document also proposes a citizen’s committee, spearheaded by Canada Unity, that would set policy alongside the Governor General and Senate. He expected to see their signatures on the document. “If they don’t, they’re incriminating themselves,” Bauder said in an interview. He began using the hashtag #SignOrResign

“On Dec. 6, we put the Senate on notice. We are having tens of thousands of people come to Ottawa, in unity, to bear hug this city until the law is restored in our country,” he told followers of Canada Unity.

When Bauder arrived in Ottawa last December, it didn’t go terribly well. “Failure is not an option,” he told his Facebook friends from outside the Rideau Hall grounds one evening. “Standing down is not an option.”

But Bauder was turned away when he and his supporters marched to the Senate building to deliver their memorandum of understanding. He led the crowd instead to a nearby Canada Post office, to drop the document in the mail.

He wouldn’t hear back.

But then the world changed. COVID-19 and growing concern about governments' response created an opportunity to broaden the movement. Bauder started plotting Operation Bear Hug 2.0, which would become the convoy. The timing was perfect. A political knife fight was brewing over the decision to require truckers to show proof of their COVID-19 vaccination status when crossing the U.S-Canada border.

The organizers started to assemble: King signed on as a road captain for Alberta. In the months prior, he had accused Trudeau of stealing an election and warned his followers to stock up on meat and supplies to prepare for "what's coming." Tamara Lich, who had taken on a position with the Western separatist Maverick Party, started an online fundraising campaign to finance the convoy. Benjamin Dichter later joined as a spokesperson, and brought Tom Quiggin along as an unofficial intelligence adviser for the occupation. (Quiggin had recently turned his professional attention to Trudeau's push for what he baselessly described as a "social credit scoring system, much like Communist China has now.") In Ottawa, Norman Traversy was part of a "reception committee" for the truck convoy's arrival.

As plans for the so-called "Freedom Convoy" gained momentum, its leaders made clear that they were in it for the long haul. On a livestream with Bauder, King promised, "We are going to fix our broken country, and I'm not leaving Ottawa until it's done." Bauder chimed in: "Neither of us are." King vowed that "everybody" involved was committed to occupying the capital. "I'm going to live on Wellington Street, right in front of Parliament."

Jason LaFace, who signed up as a road captain and hosted Canada Unity's official podcast, promised "when we get to Ottawa, we're not leaving until Justin Trudeau leaves government and the Liberal government is dissolved."

Bauder tapped into a well of like-minded support. That included Action4Canada, which had sued the Canadian government, alleging "a massive and concentrated push for mandatory vaccines of every human on the planet earth with concurrent electronic surveillance" and accused Trudeau of taking part in the plot at the behest of "international Billionaire Oligarchs, and oligarch organizations such as Bill Gates ... (and) the World Economic Forum."

As the days passed, support grew: Donations poured in, from within Canada and beyond, and a network of Facebook pages racked up tens of thousands of new followers.

And unlike Bauder's previous efforts, dozens of trucks actually set out for Ottawa — from Prince Rupert to St John's — when the planned departure day, Jan. 22, came around. The online fundraising campaign smashed past \$1 million.

The convoy was actually happening.

For some, the convoy's destination in downtown Ottawa would be a place to commune with like-minded citizens, to make a point but also to lounge in a hot tub, listen to a DJ and play street hockey.

But to Canada's security establishment, the occupation was anything but fun and games.

On Jan. 27, a bulletin went out from the Canadian Security Intelligence Service's Integrated Terrorism Assessment Centre with an alarming headline.

"Extremists may attempt to seize the opportunity of public protest," said the bulletin, which was sent to intelligence, police and first-responder agencies. It warned that several elements had joined the convoy promising civil war, attacks on politicians, and a Canadian version of the Jan. 6 insurrection in Washington.



The centre judged that the protest was likely to be peaceful, but flagged groups and individuals in the growing convoy that espoused “violent anti-authority/anti-government views.”

Indeed, King had once predicted in a video that “Trudeau, someone’s gonna make you catch a bullet someday,” and warned the rest of the House of Commons that somebody would “do ya’s in.” Even before the convoy arrived in Ottawa, King said the point of occupying Ottawa was to terrorize politicians. “What we want to focus on is our politicians — their houses, their locations,” he said.

The leader of a convoy leaving from Quebec was Steeve “L’Artiss” Charland, a former core organizer of far-right militant group La Meute. He announced that his new group, Les Farfadaas, would be heading to Ottawa as well: It would end up occupying a stretch of downtown Gatineau. “We stay here. We’re not going anywhere. We have a free country or we are dead,” he said in an interview.

Tyler Russell, head of the far-right Canada First organization said on a livestream, “When you go in and you see these counterprotesters, you understand who our enemies are, right? ... They are complicit in this globalist plan.”

One group that caught the attention of CSIS in particular was Diagon. Started as a running joke by far-right internet trolls known as the Plaid Army, its founder, Jeremy MacKenzie, insists it is not a militant or extremist group but a “social club.”

But Diagon members have shared images of Trudeau’s head on a spike. Its members have met in real life, posing with assault-style rifles and shotguns. Its followers have fantasized online about installing themselves in heavily fortified compounds, out of reach of the state. MacKenzie has frequently alluded to a coming race war, and has adopted the catchphrase “gun or rope,” referring to methods of executing the ideological opponents of their aspirational state.

Before the trucks set out for Ottawa, MacKenzie promised in a video that they would “block up the city, and not leave until either the mandates are lifted, and/or the entire government resigns. It’s going to cause food shortages, parts shortages, industrial shortages.

“I only got one thing to say to those guys,” he added with a laugh. “Let’s go, Justin. What are you gonna do?”

On a podcast, another Plaid Army member promised “this is gonna be bigger than Oka. This is gonna be bigger than the FLQ and the October Crisis.”

And despite their more radical tone, they were motivated by the same conspiracy theories as the convoy’s organizers. In a mid-February livestream, MacKenzie warned his listeners not to trust promises from the Conservative party to repeal vaccination mandates. “Are they? Or are they gonna just replace them with a digital ID they’re gonna roll out here for the UN and Klaus Schwab?” he asked. MacKenzie would be regularly spotted on the streets of Ottawa during the occupation.

The government intelligence assessment rated a co-ordinated terror attack or storming of Parliament as unlikely, but warned that “a dedicated group of protesters” could “prolong their protest in Ottawa and/or seek interaction with Canadian politicians” — a warning that many critics say Ottawa Police failed to take seriously.

Organizers framed the demonstration as a protest against COVID-19 vaccination mandates and lockdowns, a cause within the mainstream of Canadian opinion. Support from some leading Conservative politicians seemed to lend credibility to that idea. But even during the occupation, darker motivating beliefs were apparent.



The protest teemed with outstretched arms wielding cellphones, broadcasting live — to Facebook, Twitter, TikTok, but also to alternative social media sites Bitchute and Rumble. Occupiers, and their supporters back home, essentially had a 24-hour news network — by occupiers, for occupiers. One of the most omnipresent of those streamers was former People’s Party candidate Laura-Lynn Tyler Thompson. She had amassed a considerable social media following by promoting, among others, Norman Traversy and firebrand pastor Henry Hildebrandt, an ardent opponent of mask and physical distancing requirements.

“Have you seen the video where Klaus Schwab is admitting that they hand-picked Trudeau, and they have used him to destroy our nation?” Thompson said. Hildebrandt nodded, emphatically interjecting with “Yes! Yes!” Hildebrandt regularly led prayer sessions in front of Parliament, vowing to return God to the House of Commons.

Intense interest from abroad made minor celebrities of the convoy leaders. Dichter, who became a regular face on Fox News, offered his thoughts on the World Economic Forum in a YouTube interview. “Klaus Schwab — I jokingly say, well, for the third time we have a left-wing German who’s going to save the world. What could go wrong?” he said, adding that “we live in a society where these people, globally, are trying to institute policy, so it seems, to prop up the degenerates and cause conflict.”

Quiggin began producing daily “intelligence reports” that warned that the federal government was launching an “‘information operation’ in order to provoke civil disobedience and violence.” He included a list of prominent Canadians who “are members of the World Economic Forum.”

As the scrutiny ramped up, some of the organizers tried to distance themselves from controversial statements that were jeopardizing their fundraising efforts. That proved difficult in the case of someone like Pat King, who was mobbed by supporters

wherever he went. When King put out a call for trucks to join him in a slow roll to the airport, which also happened to be a police staging area, dozens of trucks signed up. “When Trudeau goes to jail, he can have all the mandates he wants,” he told a livestream.

Norman Traversy said he would be restarting his plan to have Trudeau arrested and prosecuted. But for the time being, he was delegating responsibilities from inside one of the occupation’s “command centres” in a downtown hotel. “There’s no boss of this group,” he said.

Dichter told a news conference much the same. “Because this is so organic, there are many people in different groups that have latched on to the movement,” he said.

It was becoming apparent that this wasn’t going to end well.

In Ottawa, police were confronted with a situation far removed from the peaceful, fun-loving party the occupiers described.

“Members of racialized, faith-based, LGBTQ communities were threatened and verbally harassed on a regular basis,” said Ottawa Police Interim Chief Bell. When officers tried to stop the flow of fuel canisters into the downtown core, the occupiers would “swarm our officers, threaten them, to the point that they couldn’t do their job.”

Policing sources say a significant factor in the city’s unwillingness to clear the occupation sooner turned on what was present in the trucks, and what the occupiers’ true intentions were.

Those fears proved prescient in other parts of the country. On Feb. 14, four men were arrested in Coutts, Alta., the scene of a border protest, and charged with conspiracy to commit murder; a significant weapons cache was seized. The RCMP alleged that the four men had plans to kill Mounties and members of the public. The Diagon patch was sewn into some of the seized body armour and one of the men arrested was reported by Anti-Hate Canada to be “head of security” for MacKenzie’s so-called “social club.” MacKenzie would ask his followers to pray for the men arrested, saying, “we haven’t heard from them.” He would later deny knowing any of the men accused.

A source with knowledge of the emergency response said there were serious fears within the Ottawa Police Service that someone was leaking operational information to the occupiers — perhaps even giving them access to encrypted radio channels. Bell would only say there are “very serious allegations” against a “very small group” of officers who were affiliated with the occupation.

The Star spoke to one officer, on leave without pay for refusing to get vaccinated, who visited the occupation but vehemently denied leaking information to the occupiers. “I have never seen Canada more unified,” he said.

Concerns of a mole were raised again when, after police moved in to clear the encampments, the logs of an RCMP group chat were posted to Telegram by Jeremy MacKenzie.

On Valentine’s Day, Trudeau announced that he had decided to invoke the Emergencies Act.

The announcement sent shock waves across the country, reviving memories of his father’s use of the War Measures Act during the FLQ Crisis. The updated law’s powers, however, were far less expansive. They enabled Ottawa to freeze bank accounts, forbid entry to certain areas, and press tow trucks into service.

Public Safety Minister Marco Mendicino told the Star there was a series of “inflection points” before that decision was made, but said the foiling of the alleged plot to kill RCMP officers “revealed the extent to which some of these individuals were, potentially, willing to go.”

Even if they were convinced that using emergency powers was necessary, the politicians remained nervous, Mendicino says. “We almost collectively held our breath when we invoked the Emergencies Act, because we know it could only take one person to set off a series of events that could result in mass casualties and damage.”

Mendicino says the chaotic month proved that “the tools and laws we have on our books aren’t effective enough” at dealing with this type of movement. He hinted that his government was considering making some permanent legal changes to supply police with some of these powers, although he didn’t specify what that would look like.

Some of those who enabled this occupation won’t be part of whatever that new movement looks like. King and Lich were both arrested and charged with criminal offences; King’s attempts to be released on bail are ongoing, while Lich’s bail terms prohibit her from participating in demonstrations. Dichter has re-emerged in the world of bitcoin, leveraging his experience sourcing donations that are beyond government’s grasp. Quiggin continues his podcast, turning his attention in recent weeks to the conflict in Ukraine. Once he recovered his RV from a city impound lot, Bauder headed west; by early March, he had reached Victoria, where a rump of the Ottawa occupiers set their sights on the B.C. government, occupying the legislature grounds in the provincial capital.

The movement has now outgrown the former organizers. Sympathetic social media channels continue to expand. Groups like Diagonale are recruiting new members. The conspiracy theorists that propelled this movement proliferate online. Some demonstrators no doubt returned from Ottawa satisfied, believing that they had made their point. But others came back armed with dangerous lessons. As one put it on a recent livestream: “Violence in some way, shape, or form is the only way these people are going to respond.”

Justin Ling is a freelance reporter

Read more about: [Ottawa](#)

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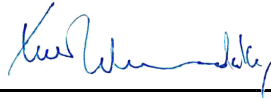
BUSINESS

Unifor whistleblower reported Jerry Dias after being offered \$25K, Star learns

This is Exhibit “RRRRR” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

ZEXI LI, HAPPY GOAT COFFEE COMPANY INC,
7983794 CANADA INC. (c.o.b. as UNION: LOCAL 613)
and GEOFFREY DEVANEY

Plaintiffs

- and -

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING,
JAMES BAUDER, BRIGITTE BELTON, DANIEL BULFORD, DALE ENNS,
CHAD EROS, CHRIS GARRAH, MIRANDA GASIOR, JOE JANSEN,
JASON LAFACE, TOM MARAZZO, RYAN MIHILEWICZ, SEAN TIESSEN,
NICHOLAS ST. LOUIS (a.k.a. @NOBODYCARIBOU),
FREEDOM 2022 HUMAN RIGHTS AND FREEDOMS,
DJ WASSENAAR, COUNTY LINE CONSTRUCTION INC. c.o.b. as COUNTY LINE FARMS,
CHRIS SCOTT, WHISTLE STOP (2012) LTD. c.o.b. as THE WHISTLE STOP CAFÉ,
DAVID ALDERTON, ISABELLE PERREAULT, SAMUEL MACAMEAU, TRANSPORT ISM
QUEBEC INC., PAUL DESJARDINS, 9189-1903 QUEBEC INC. c.o.b. as MAR-YAN
TRANSPORTS, STEVE FORTIER, ENTERPRISE STEVE FORTIER INC., PAUL AUBUT,
ELRANCHO INC., ROD RICKER, 1264288 ONTARIO INC. c.o.b. as RICKER FARMS
LTD., DAVE GUNSON, 1577961 ONTARIO LTD. c.o.b. as GUNSON TRANSPORT LTD.,
JASON BOSSÉ, GOAT TRANSPORT INC., NATHALIE ROUTHIER, VIRGIL BLACKMORE,
JAY VANERWIER, GUY MEISTER, JOHNNY HAGEN, DON ROSS, 2029181 ONTARIO
LTD. c.o.b. as ADT TRANSPORTATION, EDWARD NIEBRZYDOWSKI, 1219536
ONTARIO INC. c.o.b. as E NIEB SERVICES INC., GLENN MYER, TYSON GRAW,
BRADLEY HOWLAND, HOLDEN RHODES, FRANCIS LÉPINE, CHRIS HALLAM,
PHILIPPE BEDARD, AARON OOSTERHOFF, RICHARD MUSCA, EMILY SEGAL,
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10,
JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15,
JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20,
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JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50,
JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55,
JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59, JOHN DOE 60,
JANE DOE 1 and JANE DOE 2

Defendants

Proceeding under the *Class Proceedings Act, 1992*

FRESH AS AMENDED STATEMENT OF CLAIM
(Claim originally issued on February 4, 2022)

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office, **WITHIN TWENTY DAYS** after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM, and \$10,000 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and \$400 for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date: _____

Issued by: _____

Registrar
Court House,
161 Elgin Street
Ottawa, Ontario

TO: Chris Barber
Swift Current, Saskatchewan

AND TO: Benjamin Dichter
Toronto, Ontario

AND TO: Tamara Lich
Medicine Hat, Alberta

AND TO: Patrick King
Red Deer, Alberta

AND TO: James Bauder
Alberta

AND TO: Brigitte Belton
Wallaceburg, Ontario

AND TO: Daniel Bulford
Ottawa, Ontario

AND TO: Dale Enns
Winkler, Manitoba

AND TO: Chad Eros
Moose Jaw, Saskatchewan

AND TO: Chris Garrah
Ottawa, Ontario

AND TO: Miranda Gasior
Lloydminster, Saskatchewan

AND TO: Joe Jansen
Winkler, Manitoba

AND TO: Jason LaFace
Sudbury, Ontario

AND TO: Tom Marazzo
Amherstview, Ontario

AND TO: Ryan Mihilewicz
Prince Albert, Saskatchewan

AND TO: Sean Tiessen
Grand Forks, British Columbia

AND TO: Nicholas St. Louis (a.k.a. “@NobodyCaribou”)
Ottawa, Ontario

AND TO: Freedom 2022 Human Rights and Freedoms Inc.
1493 Leeds and Grenville 2
Mallorytown, ON K0E 1R0

AND TO: DJ Wassenaar
Jarvis, Ontario

AND TO: County Line Construction Inc. c.o.b. as County Line Farms
Jarvis, Ontario

AND TO: Chris Scott
Mirror, Alberta

AND TO: Whistle Stop (2012) Ltd. c.o.b. as The Whistle Stop Café
Mirror, Alberta

AND TO: David Alderton
Sarnia, Ontario

AND TO: Isabelle Perreault
Preissac, Quebec

AND TO: Samuel Macameau
Pressiac, Quebec

AND TO: Transport ISM Quebec Inc.
Pressiac, Quebec

AND TO: Paul Desjardins
Sainte-Eulalie, Quebec

AND TO: 9189-1903 Quebec Inc. c.o.b. as Mar-Yan Transports
Sainte-Eulalie, Quebec

AND TO: Steve Fortier
Drummondville, Quebec

AND TO: Enterprise Steve Fortier Inc.
Drummondville, Quebec

AND TO: Paul Aubut
Saint-Quentin, New Brunswick

AND TO: Elrancho Inc.
Saint-Quentin, New Brunswick

AND TO: Rod Ricker
Dunnville, Ontario

AND TO: 1264288 Ontario Inc. c.o.b. as Ricker Farms Ltd.
Dunnville, Ontario

AND TO: Dave Gunson
Tara, Ontario

AND TO: 1577961 Ontario Ltd. c.o.b. as Gunson Transport Ltd.
Tara, Ontario

AND TO: Jason Bossé
Bowmanville, Ontario

AND TO: Goat Transport Inc.
Bowmanville, Ontario

AND TO: Nathalie Routhier
Ottawa, Ontario

AND TO: Virgil Blackmore
Glencoe, Ontario

AND TO: Jay Vanerwier
Smithville, Ontario

AND TO: Guy Meister
Aylesford, Nova Scotia

AND TO: Johnny Hagen
Cornwall, Ontario

AND TO: Don Ross
Dawson Creek, British Columbia

AND TO: 2029181 Ontario Ltd. c.o.b. as ADT Transportation

Leamington, Ontario

AND TO: Edward Niebrzydowski
Mississauga, Ontario

AND TO: 1219536 Ontario Inc. c.o.b. as E Nieb Services Inc.
Mississauga, Ontario

AND TO: Glenn Myer
Harriston, Ontario

AND TO: Tyson Graw
Battleford, Saskatchewan

AND TO: Bradley Howland
Sussex Corner, New Brunswick

AND TO: Holden Rhodes
London, Ontario

AND TO: Francis Lépine
Kanata, Ontario

AND TO: Chris Hallam
Ottawa, Ontario

AND TO: Philippe Bedard
Carp, Ontario

AND TO: Aaron Oosterhoff
Lincoln, Ontario

AND TO: Richard Musca
Ottawa, Ontario

AND TO: Emily Segal
Ottawa, Ontario

AND TO: John Doe 1 to John Doe 60

AND TO: Jane Doe 1 and Jane Doe 2

CLAIM

1. The Plaintiffs, on behalf of the subclasses described herein, claim the following:
 - (a) an order certifying this action as a class proceeding and appointing the Plaintiffs as the representative Plaintiffs for the Resident Subclass, the Business Subclass and the Employee Subclass (as defined below);
 - (b) general damages for private nuisance and public nuisance, in the amount of \$36-million for pain and suffering and psychological distress, or any such amount that this Honourable Court deems appropriate;
 - (c) special damages for private nuisance and public nuisance, in the amount of \$200-million for business losses;
 - (d) special damages for private nuisance and public nuisance, in the amount of \$60-million for loss of wages;
 - (e) punitive damages in the amount of \$10-million, as against the Organizer Defendants and Trucker Defendants, as further described below;
 - (f) injunctive relief prohibiting the continuation of the tortious behaviour;
 - (g) pre-judgment and post-judgment interest in accordance with the *Courts of Justice Act*, as amended;
 - (h) the costs of this action, including HST;
 - (i) the costs of notice and of administering the plan of distribution of the recovery in this action, plus applicable taxes, pursuant to section 26 of the *Class Proceedings Act*, 1992, S O 1992, c. 6; and
 - (j) such further and other relief as this Honourable Court may deem just.

OVERVIEW

2. Over the past two years, the COVID-19 pandemic has caused significant stress, severe illness, death and grief to people across Canada and every person has been affected. Over 33,000 Canadians have died from COVID-19 and thousands more suffer from its prolonged effects.

3. Governments at all levels across the country have adopted public health measures to prevent severe illness and death from COVID-19. These public health measures have caused significant disruption to the lives of every Canadian. Despite this disruption, the vast majority of Canadians support public health measures, including vaccine mandates, because they believe these measures save lives.

4. A minority of Canadians are strongly opposed to these public health measures. The Defendants are among this minority. To express their political opposition to COVID-19 public health measures, the Defendants organized a “Freedom Convoy” of vehicles, including a large number of semi-trailer-tractor trucks, to travel from different parts of Canada and converge on the national capital of Ottawa.

5. The Defendants planned to organize and conduct a large demonstration in the vicinity of the Parliament Buildings in Ottawa. Like many protesters, they wanted to advance their grievances to political leaders. Unlike other protesters, the Defendants wanted to force the Government of Canada, and other levels of governments, to accept their demands. To ensure that happened, the Defendants designed a plan to block all the streets and roadways around Parliament Hill and the surrounding neighbourhoods, and to make as much noise as possible to cause discomfort and distress for the residents and businesses of downtown Ottawa in order to apply pressure on political leaders. To make that noise, the Defendants planned, organized, encouraged and directed “Freedom Convoy” participants to blast the horns on their vehicles, non-stop, for several hours.

6. As planned by the Defendants, the Freedom Convoy vehicles began to arrive in Ottawa in Ottawa on Friday, January 28, 2022. As planned by the Defendants, the Freedom Convoy protests formally launched on Saturday, January 29, 2022. Unlike most protests, the Freedom Convoy decided to stay and keep protesting, every day and night, until the Government of Canada met their demands of dropping all public health measures across Canada. The fact that public health measures are predominantly implemented by provincial governments has not deterred the Defendants. At the time this claim is issued, the protest remains ongoing.

7. A key tactic of the Freedom Convoy is blasting vehicle horns all day. These horns include the air horns and train horns on the many semi-trucks. Air horns and train horns create an extremely loud noise as a warning. Air horns and train horns emit noise in the range of 100 to 150 decibels. These horns are not meant to be used for longer than a few seconds because the sound levels are dangerous and cause permanent damage to the human ear. Despite these dangers, the Freedom Convoy trucks have been blasting these dangerous horns almost continuously for 12 to 16 hours per day.

8. The Freedom Convoy trucks have largely remained parked on public streets and roads indefinitely, with their engines idling 24 hours per day. This has led to the emission of noxious diesel fumes from 300 to 500 trucks congregated in a relatively small area, making it difficult for people to breathe.

9. The historical neighbourhood around the Parliament Buildings in Ottawa is home to approximately 24,000 residents. These residents are used to the inconvenience of large demonstrations and protests. Sometimes they even join in if they believe in the cause. These residents understand and respect the importance of democratic freedoms, including the freedoms of association, assembly and expression. But they have never experienced anything like the constant and excruciatingly loud horns of the Defendants' Freedom Convoy and the prolonged occupation of their streets. For the approximately 12,000 residents who live closest to the protests, the non-stop blaring horns have caused unbearable torment in the

sanctity of their own homes. Combined with the diesel fumes, unexpected fireworks, and loud sound systems blasting music, the Freedom Convoy occupation has made downtown Ottawa a living hell for residents.

10. Hundreds of businesses operate in downtown Ottawa with thousands of employees. The blocked roads, diesel fumes, and constant blaring of horns has deterred customers and made it difficult to impossible for many businesses to operate. As a result, many businesses in downtown Ottawa have closed entirely, causing significant losses. Other businesses that have remained open but have seen a significant drop in revenue.

11. Thousands of people work in downtown Ottawa. Many have been laid off or had shifts cancelled because their employer closed operations or restricted their operations due to public nuisance caused by the Freedom Convoy occupation. These employees have lost wages over the course of two weeks and counting.

12. The Plaintiffs bring this action in private nuisance and public nuisance against the Defendants for the serious harms and losses experienced by the residents, businesses and workers in downtown Ottawa.

PARTIES

13. The Plaintiff Zexi Li resides in Ottawa, Ontario, within five blocks of Parliament Hill. She is a 21-year-old public servant and graduate of the University of Ottawa.

14. The Plaintiff Happy Goat Coffee Company Inc (“Happy Goat”) is a company incorporated under the *Canada Business Corporations Act*, RSC 1985, c C-44. The Plaintiff Happy Goat is an Ottawa business that purchases direct trade coffee, roasts the beans locally, and operates several coffee kiosk and café locations in and around Ottawa. The Plaintiff Happy Goat operates three locations within the affected area of downtown Ottawa, a café at 229 Rideau Street, a café in the National Gallery of Canada, and a kiosk at the Rideau Station on the O-Train Confederation Line under

the Rideau Centre mall. The Plaintiff's coffee business at those three locations have been forced to close due to the Freedom Convoy occupation of downtown Ottawa.

15. The Plaintiff 7983794 Canada Inc., carrying on business as Union: Local 613, is a company incorporated under the *Canada Business Corporations Act*, RSC 1985, c C-44 (hereinafter "Union: Local 613"). The Plaintiff Union: Local 613 operates a restaurant at 315 Somerset Street West in Ottawa, Ontario. The Plaintiff's restaurant business has been seriously affected by the presence of the Freedom Convoy in the neighbourhood.

16. The Plaintiff Geoffrey Devaney resides in Ottawa, Ontario. He does not reside downtown but he is employed full-time as a restaurant server in the Byward Market. The restaurant where he works has been affected by the Freedom Convoy occupation of downtown Ottawa resulting in the Plaintiff Devaney losing shifts and income.

17. The Defendant Chris Barber resides in Swift Current, Saskatchewan. He is one of the organizers of the Freedom Convoy and is one of their official spokespersons. He is a truck driver, who owns a trucking company in Saskatchewan. He is also a director of the Defendant Freedom 2022 Human Rights and Freedoms, a non-profit corporation described further below.

18. The Defendant Benjamin Dichter resides in Toronto, Ontario. He is one of the main organizers of the Freedom Convoy and is one of their official spokespersons. Dichter is a former Conservative Party of Canada candidate and a prominent supporter of the People's Party of Canada. He is also a director of the Defendant Freedom 2022 Human Rights and Freedoms, a non-profit corporation described further below.

19. The Defendant Tamara Lich resides in Medicine Hat, Alberta. She is one of the main organizers of the Freedom Convoy and frequently acts as a spokesperson on social media accounts associated with the Freedom Convoy. She is listed as the organizer of the Freedom Convoy's fundraiser on the crowdsourced fundraising

platforms GoFundMe and GiveSendGo. Lich is the Secretary for the Maverick Party, a western separatist group formerly known as Wexit Canada, and was also an organizer for the Yellow Vests Canada movement. She is also a director of the Defendant Freedom 2022 Human Rights and Freedoms, a non-profit corporation described further below.

20. The Defendant Patrick King resides in Red Deer, Alberta. He is one of the organizers of the Freedom Convoy occupation. King was a co-founder of Wexit Canada and an organizer for the Yellow Vest Canada movement and involved in the Canada Unity group.

21. The Defendant James Bauder resides in Alberta. He is one of the organizers of the Freedom Convoy. He created the Canada Unity group and website and developed the original plan to occupy Ottawa, referred to below as “Operation Bearhug”. He is the author of a Memorandum of Understanding on behalf of Canada Unity that called for the Governor General and the Senate of Canada to take power from the Prime Minister and force federal and provincial governments to lift all public health measures related to the COVID-19 pandemic, including mask mandates and vaccine passports.

22. The Defendant Brigitte Belton resides in Wallaceburg, Ontario. She is one of the organizers of the Freedom Convoy and acts as a “captain” and liaison with truck drivers from Ontario who have travelled to Ottawa to engage together in the tortious behaviour set out in this claim.

23. The Defendant Daniel Bulford resides in Ottawa, Ontario. He is a former police officer and regular member of the Royal Canadian Mounted Police. He is one of the organizers of the Freedom Convoy used his extensive policing experience and contacts to act as a liaison with law enforcement agencies on behalf of the Freedom Convoy protestors. He also and played an important logistical and coordinating role in the tactical planning and execution of the tortious horn blasting and idling trucks. This

included ensuring the truck drivers had sufficient fuel and other supplies to continue the tortious behaviour set out in this claim and coordinating the horn tactic.

24. The Defendant Dale Enns resides in or near Winkler, Manitoba. He is one of the organizers of the Freedom Convoy and acts as a “captain” and liaison with truck drivers from Manitoba who have travelled to Ottawa to engage together in the tortious behaviour set out in this claim.

25. The Defendant Chad Eros resides in Moose Jaw, Saskatchewan. He is one of the organizers of the Freedom Convoy and, among other activities that support the illegal protest, he plays a role in collecting and distributing money to truck drivers and other participants to further the tortious behaviour set out in this claim. He is also a director of the Defendant Freedom 2022 Human Rights and Freedoms, a non-profit corporation described further below.

26. The Defendant Chris Garrah resides in Ottawa, Ontario. He is one of the organizers of the Freedom Convoy and, among other activities that support the illegal protest, he plays a role in collecting and distributing money to truck drivers and other participants to further the tortious behaviour set out in this claim. He is also a director of the Defendant Freedom 2022 Human Rights and Freedoms, a non-profit corporation described further below.

27. The Defendant Miranda Gasior resides in Lloydminster, Saskatchewan. She is one of the organizers of the Freedom Convoy and, among other activities that support the illegal protest, she plays a role in collecting and distributing money to truck drivers and other participants to further the tortious behaviour set out in this claim. She is also a director of the Defendant Freedom 2022 Human Rights and Freedoms, a non-profit corporation described further below.

28. The Defendant Joe Jansen resides in or around Winkler, Manitoba. He is one of the organizers of the Freedom Convoy and acts as a “captain” and liaison with truck drivers from Manitoba who have travelled to Ottawa to engage together in the tortious behaviour set out in this claim.

29. The Defendant Jason LaFace resides in Sudbury, Ontario. He is one of the organizers of the Freedom Convoy and acts as a “captain” and liaison with truck drivers from Northern Ontario who have travelled to Ottawa to engage together in the tortious behaviour set out in this claim.

30. The Defendant Tom Marazzo resides in Amherstview, Ontario. He is a former military officer in the Canadian Armed Forces. He is one of the organizers of the Freedom Convoy and has used his military skills and training to serve an important logistical and coordinating role in the tactical planning and execution of the tortious horn blasting and idling trucks.

31. The Defendant Ryan Mihilewicz resides in Prince Albert, Saskatchewan. He is one of the organizers of the Freedom Convoy and acts as a “captain” and liaison with truck drivers from Saskatchewan who have travelled to Ottawa to engage together in the tortious behaviour set out in this claim.

32. The Defendant Sean Tiessen resides in Grand Forks, British Columbia. He is one of the organizers of the Freedom Convoy and acts as a “captain” and liaison with truck drivers from British Columbia who have travelled to Ottawa to engage together in the tortious behaviour set out in this claim. He is also a director of the Defendant Freedom 2022 Human Rights and Freedoms, a non-profit corporation described further below.

33. The Defendant Nicholas St. Louis resides in Ottawa, Ontario. He is cryptocurrency enthusiast who uses the Twitter account “@NobodyCaribou” and operates the Bitcoin Stoa website and Youtube channel. He refers to himself as the “Bitcoin Team Lead” and claims to be the person overseeing Bitcoin donations to the Freedom Convoy.

34. The Defendant Freedom 2022 Human Rights and Freedoms (“Freedom 2022”) is a not-for-profit corporation incorporated on January 30, 2022 under the *Canada Not-for-profit Corporations Act*, SC 2009, c. 23. Freedom 2022 was established for the

purpose of receiving and distributing money raised in support of the Freedom Convoy 2022 through fundraising campaigns hosted by online crowdfunding platforms such as GiveSendGo. It was incorporated after the crowdfunding platform GoFundMe suspended the Freedom Convoy 2022 fundraising account, which had been organized by the Defendants Lich and Dichter. The Defendants Eros, Gasior, Lich, Barber, Garrah and Tiessen are all named directors of the Defendant Freedom 2022.

35. The Defendant DJ Wassenaar resides in or near Jarvis, Ontario. He is a participant in the Freedom Convoy protest, whose semi-truck arrived and was parked on Wellington Street in downtown Ottawa on or around January 28, 2022 until at least February 12, 2022.

36. The Defendant County Line Construction Inc. (c.o.b. County Line Farms, County Line Construction & Haybury Farms) is an Ontario company that is owned wholly or in part by the Defendant DJ Wassenaar. County Line Construction Inc. wholly or in part owns or otherwise has control over the semi-truck that arrived and was parked on Wellington Street in downtown Ottawa on or around January 28, 2022 until at least February 12, 2022 as part of the Freedom Convoy protest.

37. The Defendant Christopher Scott resides in or near Mirror, Alberta. He is a participant in the Freedom Convoy protest, who has blasted the horns on his crane truck as part of the protest.

38. The Defendant Whistle Stop (2012) Ltd (c.o.b. The Whistle Stop Café) is an Alberta company that is owned wholly or in part by the Defendant Christopher Scott, and that wholly or in part owns or otherwise has control over the crane truck driven and operated by the Defendant Christopher Scott in the Freedom Convoy protest.

39. The Defendant David Alderton resides in or near Sarnia, Ontario. He is a participant in the Freedom Convoy protest, whose semi-truck arrived and was parked in downtown Ottawa on or around January 28, 2022 until approximately February 12, 2022. Alderton routinely blasted the horns of his truck as part of the protest, including delivering what he called his daily “morning wake-up call”.

40. The Defendant Isabelle Perreault resides in or near Preissac, Quebec. She is a participant in the Freedom Convoy protest, whose semi-truck arrived and was parked on or near Wellington Street in downtown Ottawa on or around January 29, 2022 until at least February 13, 2022.

41. The Defendant Samuel Macameau resides in or near Preissac, Quebec. He is a participant in the Freedom Convoy protest, whose semi-truck arrived and was parked on or near Wellington Street in downtown Ottawa on or around January 29, 2022 until at least February 13, 2022.

42. The Defendant Transport ISM Quebec Inc. is a Quebec company that is owned wholly or in part by the Defendants Isabelle Perreault and Samuel Macameau. Transport ISM Quebec Inc. wholly or in part owns or otherwise has control over two semi-trucks that arrived and were parked on or near Wellington Street in downtown Ottawa on or around January 29, 2022 until at least February 13, 2022 as part of the Freedom Convoy protest.

43. The Defendant Paul Desjardins resides in or near Sainte-Eulalie, Quebec. He is president the Defendant Mar-Yan Transports, and a participant in the Freedom Convoy protest, who has blasted the horns of this truck as part of the protest.

44. The Defendant 9189-1903 Quebec Inc. (c.o.b. Mar-Yan Transports) is a Quebec trucking company that is owned wholly or in part by the Defendant Paul Desjardins and that wholly or in part owns or otherwise has control over one of the trucks participating in the Freedom Convoy protest.

45. The Defendant Steve Fortier resides in or near Drummondville, Quebec. He is a principal of the Defendant Enterprise Steve Fortier Inc., and a participant in the Freedom Convoy protest, who has blasted the horns of his truck as part of the protest.

46. The Defendant Enterprise Steve Fortier Inc. is a Quebec trucking company that is owned wholly or in part by the Defendant Steve Fortier and that wholly or in part

owns or otherwise has control over one of the trucks participating in the Freedom Convoy protest.

47. The Defendant Paul Aubut resides in or near Saint-Quentin, New Brunswick. He is a principal of the Defendant Elrancho Inc., and a participant in the Freedom Convoy protest, who has blasted the horns of this trucks as part of the protest.

48. The Defendant Elrancho Inc. is a trucking company that is owned wholly or in part by the Defendant Paul Aubut, and that wholly or in part owns or otherwise has control over at least two of the trucks participating in the Freedom Convoy protest.

49. The Defendant Rod Ricker resides in or near Dunnville, Ontario. He is a principal of the Defendant Ricker Farms Ltd, and a participant in the Freedom Convoy protest, who has blasted the horns on his truck as part of the protest.

50. The Defendant Ricker Farms Ltd is an Ontario company (no. 1264288) that is owned wholly or in part by the Defendant Rod Ricker, and that wholly or in part owns or otherwise has control over one of the trucks participating in the Freedom Convoy protest

51. The Defendant Dave Gunson resides in or near Tara, Ontario. He is a principal of the Defendant Gunson Transport Ltd, and a participant in the Freedom Convoy protest, who has blasted the horns of this trucks as part of the protest.

52. The Defendant 1577961 Ontario Ltd (c.o.b. Gunson Transport Ltd) is an Ontario company that is owned wholly or in part by the Defendant Dave Gunson, and that wholly or in part owns or otherwise has control over at least two of the trucks participating in the Freedom Convoy protest.

53. The Defendant Jason Bossé resides in or near Bowmanville, Ontario. He is president of the Defendant Goat Transport, and a participant in the Freedom Convoy protest, who has blasted the horns of this trucks as part of the protest.

54. The Defendant Goat Transport Inc. is an Ontario company that is owned wholly or in part by the Defendant Jason Bossé, and that wholly or in part owns or otherwise has control over at least one of the trucks participating in the Freedom Convoy protest.

55. The Defendant Nathalie Routhier resides in or near Ottawa, Ontario, and is a participant in the Freedom Convoy protest, whose dump truck arrived and was parked in downtown Ottawa as part of the pro has blasted the horns of her truck as part of the protest on our around January 29, 2022 until at least February 1, 2022.

56. The Defendant Virgil Blackmore resides in or near Glencoe, Ontario. He and his wife are participants in the Freedom Convoy protest, and their semi-truck arrived and was parked on or near Wellington Street in downtown Ottawa as part of the protest.

57. The Defendant Jay Vanerwier resides in or near Smithville, Ontario. He is a participant in the Freedom Convoy protest, and his semi-truck arrived and was parked on or near Wellington Street in downtown Ottawa as part of the protest.

58. The Defendant Guy Meister resides in or near Aylesford, Nova Scotia. He is a participant in the Freedom Convoy protest, and his semi-truck arrived and was parked across from the Senate of Canada in downtown Ottawa as part of the protest on or around January 29, 2022 until at least February 12, 2022.

59. The Defendant Johnny Hagen resides in or near Cornwall, Ontario. He is a participant in the Freedom Convoy protest, and his semi-truck arrived and was parked in downtown Ottawa with a sign on its door that read “pull the horn for liberty”.

60. The Defendant Don Ross resides in or near Dawson Creek, BC. He is a participant in the Freedom Convoy protest, whose semi-truck arrived and was parked in downtown Ottawa as part of the protest.

61. The Defendant Bradley Howland resides in or near Sussex Corner, New Brunswick. He is the President of Easy-Kleen Pressure Systems located in Sussex, New

Brunswick. On or about February 9, 2022, the Defendant Howland contributed \$75,000 USD in support of the Freedom Convoy occupation via the fundraising platform GiveSendGo with knowledge that the Freedom Convoy participants, including the Trucker Defendants, are committing the tortious acts and unlawful behaviour described further below, with the intention of facilitating these acts.

62. The Defendant Holden Rhodes resides in or near London, Ontario. He is an entrepreneur and lawyer licensed by the Law Society of Ontario. The Defendant Rhodes owns Killarney Mountain Lodge, a resort on the north shore of Georgian Bay. On or about February 8, 2022, the Defendant Rhodes donated \$25,000 USD in support of the Freedom Convoy occupation via the fundraising platform GiveSendGo with knowledge that the Freedom Convoy participants, including the Trucker Defendants, are committing the tortious acts and unlawful behaviour described further below, with the intention of facilitating these acts.

63. The Defendant Francis Lépine resides in or near Ottawa, Ontario. He is a real estate developer and a part or sole owner of Lépine Apartments. On or about February 8, 2022, the Defendant Lépine donated \$7,000 USD in support of the Freedom Convoy occupation via the fundraising platform GiveSendGo.

64. The Defendant Chris Hallam resides in or near Ottawa, Ontario. He is the President of Eco-Energy Reserves Inc., a solar power equipment company located in South Mountain, Ontario. On or about February 6, 2022, The Defendant Hallam donated \$3,000 USD in support of the Freedom Convoy occupation via the fundraising platform GiveSendGo with knowledge that the Freedom Convoy participants, including the Trucker Defendants, are committing the tortious acts and unlawful behaviour described further below, with the intention of facilitating these acts.

65. The Defendant Aaron Oosterhoff resides in or near Lincoln, Ontario. He is the owner and CEO of Spring Creek Quail Farms, a producer of quail eggs located in St. Anne's, Ontario. On or about February 8, 2022, the Defendant Oosterhoff donated \$2,000 USD in support of the Freedom Convoy occupation via the fundraising platform

GiveSendGo with knowledge that the Freedom Convoy participants, including the Trucker Defendants, are committing the tortious acts and unlawful behaviour described further below, with the intention of facilitating these acts.

66. The Defendant Richard Musca resides in or near Ottawa, Ontario. He is an officer and Elder of Metcalfe Street Church, an Evangelical Christian church which offers worship services at various locations in the City of Ottawa. On or about February 5, 2022, the Defendant Musca donated \$1,000 USD in support of the Freedom Convoy occupation via the fundraising platform GiveSendGo with knowledge that the Freedom Convoy participants, including the Trucker Defendants, are committing the tortious acts and unlawful behaviour described further below, with the intention of facilitating these acts.

67. The Defendant Philippe Bedard resides in or near Carp, Ontario. On or about February 5, 2022, the Defendant Bedard donated \$2,000 USD in support of the Freedom Convoy occupation via the fundraising platform GiveSendGo, with knowledge that the Freedom Convoy participants, including the Trucker Defendants, are committing the tortious acts and unlawful behaviour described further below, with the intention of facilitating these acts. When Mr Bedard contributed, he add the comment, “The honking will continue until freedom is restored!”

68. The Defendant Emily Segal resides in Ottawa, Ontario. On or about February 5, 2022, the Defendant Segal donated \$200 USD in support of the Freedom Convoy occupation via the fundraising platform GiveSendGo, with knowledge that the Freedom Convoy participants, including the Trucker Defendants, are committing the tortious acts and unlawful behaviour described further below, with the intention of facilitating these acts.

69. The Defendants John Doe 1 to John Doe 60 are other drivers of semi-tractor-trucks and semi-tractor-trailer trucks that are parked in the downtown Ottawa core during the Freedom Convoy occupation, blasting air horns, train horns and other loud horns on their trucks as a form of protest. The John Doe Defendants’ trucks are also

idling non-stop, spewing diesel fumes throughout the downtown core. The identities of these truck drivers are unknown at the time of the issuance of the claim.

70. The Defendants Jane Doe 1 and Jane Doe 2 are unknown persons who are funding the Freedom Convoy through donations with knowledge that the Freedom Convoy participants, including the Trucker Defendants, are committing the tortious acts and unlawful behaviour described further below, with the intention of facilitating these acts.

71. The Defendants Barber, Dichter, Lich, King, Bauder, Belto, Bulford, Enns, Eros, Garrah, Gasior, Jansen, LaFace Marazzo, Mihilewicz, Tiessen and St. Louis are responsible for the planning, strategy, organizing, fundraising, material support, logistics, and tactics of the Freedom Convoy occupation, including the tortious behaviour described further below, and are hereinafter referred to as the “Organizer Defendants”. The Defendant Freedom 2022 is a non-profit corporation which was created as a conduit for funds and is also an Organizer Defendants.

72. The Defendants DJ Wassenaar, County Line Construction Inc. c.o.b. as County Line Farms, Chris Scott, Whistle Stop (2012) c.o.b. as The Whistle Stop Café, David Alderton, Isabelle Perreault, Samuel Macameau, Transport ISM Quebec Inc., Paul Desjardins, 9189-1903 Quebec Inc. c.o.b. as Mar-Yan Transports, Steve Fortier, Enterprise Steve Fortier Inc., Paul Aubut, Elrancho Inc., Rod Ricker, 1264288 Ontario Inc. c.o.b. as Ricker Farms Ltd., Dave Gunson, 1577961 Ontario Ltd. c.o.b. as Gunson Transport Ltd., Jason Bossé, Goat Transport Inc., Nathalie Routhier, Virgil Blackmore, Jay Vanerwier, Guy Meister, Johnny Hagen, Don Ross, 2029181 Ontario Ltd. c.o.b. as ADT Transportation, Edward Niebrzydowski, 1219536 Ontario Inc. c.o.b. as E Nieb Services Inc., Glenn Myer, Tyson Graw, and the John Doe Defendants, hereinafter referred to as the “Trucker Defendants”, all drove semi-trucks or semi-tractor-trailers to Ottawa and participated in the Freedom Convoy occupation of Ottawa by parking their vehicles in public roads and streets in downtown Ottawa and blasting their horns and continuously idling their engines.

73. The Defendants Howland, Rhodes, Lépine, Hallam, Bedard, Oosterhoff, Musca, Segal, Jane Doe 1 and Jane Doe 2, hereinafter referred to as the “Donor Defendants”, provided funds to the Freedom Convoy through various means with the knowledge that the Trucker Defendants are engaging in the tortious and other unlawful behaviour in Ottawa described further below, and the intention of facilitating these acts.

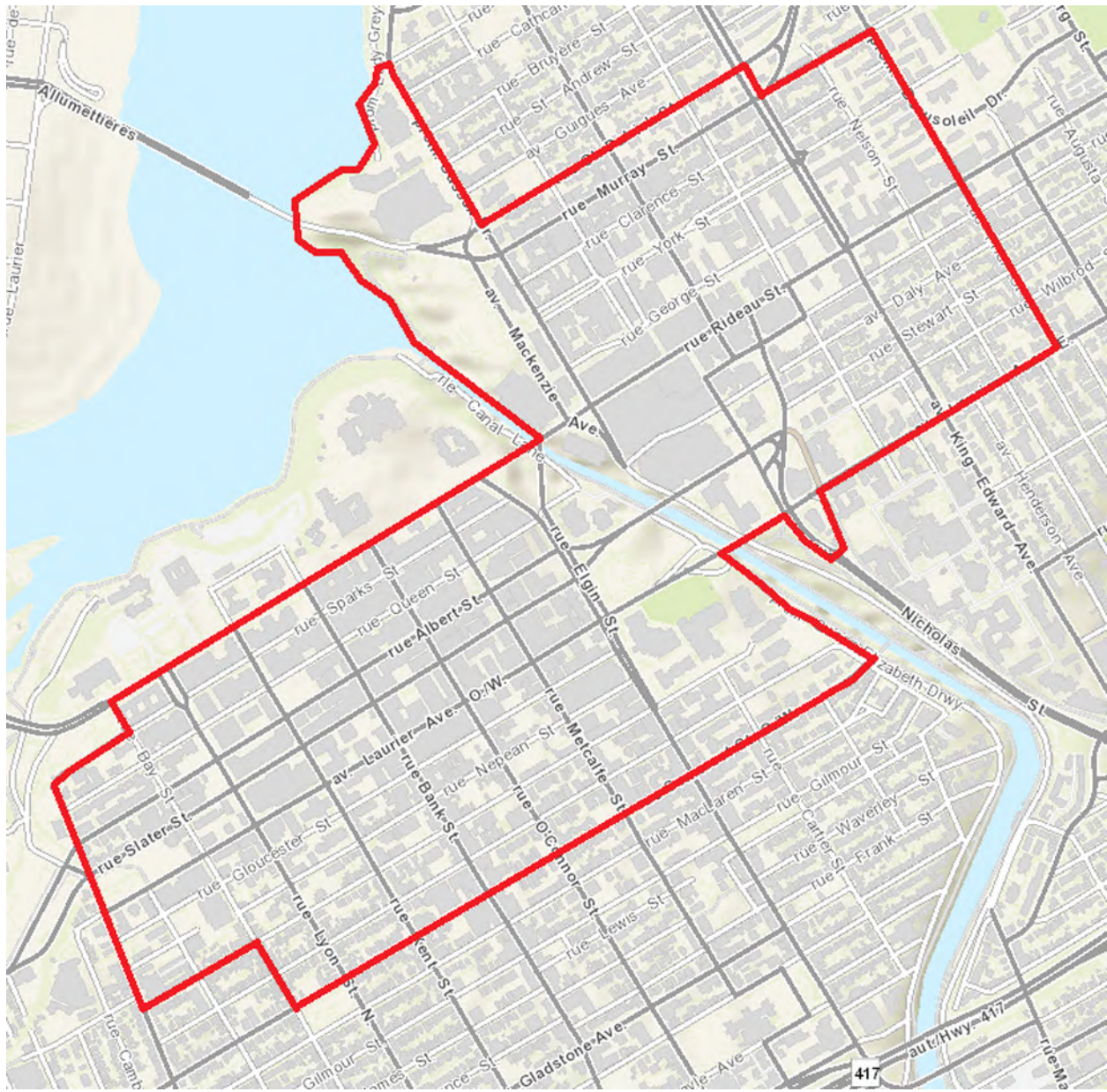
74. The Defendants engaged in a common design to occupy downtown Ottawa and engage in the tortious behaviour described further below.

OCCUPATION ZONE AND SUBCLASSES

75. The Defendants engaged in a common design to occupy downtown Ottawa for an indefinite period with semi-trucks and semi-truck-trailers, to blockade the roads and streets, and to create excessive noise and other disturbances to substantially interfere with and cause distress to everyone who lives, works or runs a business in downtown Ottawa, with the primary objective of compelling the Government of Canada, and other levels of government in Canada, to immediately drop all public health measures related to COVID-19.

76. The area of downtown Ottawa that the Defendants completely or partially blockaded, and in which they have caused extreme noise and other disturbances, is hereinafter referred to as the “Occupation Zone”, and is bounded in the following way:

Wellington Street from Bay Street to the Rideau Canal, the Rideau Canal from Wellington Street to the Ottawa River, the Ottawa River from the Rideau Canal to Lady Grey Drive, Lady Grey Drive to Sussex Drive, Sussex Drive from Bolton Street to St Patrick Street, St Patrick Street from Sussex Drive to King Edward Avenue, King Edward Avenue from St Patrick Street to Murray Street, Murray Street from King Edward Avenue to Beausoleil Drive, Beausoleil Drive from Murray Street to Friel Street, Friel Street from Beausoleil Drive to Laurier Avenue East, Laurier Avenue East from Friel Street to Waller Street, Waller Street from Laurier Avenue East to Nicholas Street, Nicholas Street from Waller Street to Laurier Avenue East, Laurier Avenue from Nicholas Street to the



78. The Plaintiff Li brings this action pursuant to the *Class Proceedings Act, 1992* on her own behalf and on behalf of all other persons who reside within the Occupation Zone in downtown Ottawa, excluding those who contributed to and/or actively supported the Freedom Convoy, hereinafter known as the Resident Subclass.

79. The Plaintiffs Happy Goat and Union: Local 613 bring this action pursuant to the *Class Proceedings Act, 1992* on their own behalf and on behalf of all other businesses that operate within the Occupation Zone in downtown Ottawa and experienced business losses due to tortious behaviour of the Defendants, excluding those who contributed to and/or actively supported the Freedom Convoy, hereinafter known as the Business Subclass.

80. The Plaintiff Geoffrey Devaney brings this action pursuant to the *Class Proceedings Act, 1992* on his own behalf and on behalf of all other persons who work as employees within the Occupation Zone in downtown Ottawa and experienced wage loss due to the tortious behaviour of the Defendants, excluding those who contributed to and/or actively supported the Freedom Convoy, hereinafter known as the Employee Subclass.

ORGANIZING THE FREEDOM CONVOY OCCUPATION

81. In December 2021, the Organizer Defendants decided to organize a protest in Ottawa to pressure or compel the Government of Canada to withdraw all COVID-19 public health measures. They discussed and created a common plan to have a convoy of vehicles, including a large number of semi-trailer-tractor trucks, travel from different parts of Canada and converge in the national capital of Ottawa. Originally called “Operation Bearhug”, the plan was to cause heavy traffic with large vehicles and create gridlock by occupying downtown Ottawa for five days. The Organizer Defendants Bauder, Barber, King, Lich, Dichter, and Belton were all involved together in this original “Operation Bearhug” plan.

82. In early January 2022, the Organizer Defendants decided to expand Operation Bearhug. The new plan, called “Freedom Convoy 2022”, was to organize operators of semi-trucks and semi-truck-trailers and other large vehicles to drive from different parts of Canada and to occupy downtown Ottawa for an indefinite period until their political demands were met. The common intention of the Organizer Defendants and the Trucker Defendants was to substantially interfere with and disturb all downtown Ottawa residents and businesses with their occupation, and thereby compel the Government of Canada to meet their demands to drop all COVID-19 public health measures.

83. On or around January 14, 2022, the Organizer Defendants Barber, Dichter and Lich created a Facebook page called “Freedom Convoy 2022” which they described as a “meeting place to discuss logistics, organization and mobilization to restore our Freedoms”. The Defendants used this Facebook page to discuss logistics, organization and mobilization for the Freedom Convoy.

84. The Organizer Defendants divided responsibilities among themselves for: (i) attracting and mobilizing Trucker Defendants to join their enterprise; (ii) planning the logistics of feeding, fuelling and providing supplies to a convoy of vehicles driving to and then occupying Ottawa for an indefinite period; and (iii) fundraising to support the entire enterprise. The Organizer Defendants also decided on leaders, spokespersons, and “captains” for different regions who acted as primary liaisons with the Trucker Defendants.

85. On or around January 23, 2022, the Organizer Defendants created a page for the Freedom Convoy on the crowdsourced fundraising website GoFundMe. The Defendant Lich is listed as the organizer of this GoFundMe page, and the Defendant Dichter is listed as a Team Member.

86. On their GoFundMe page, the Organizer Defendants discussed the logistics and organization for the Freedom Convoy and solicited donations from supporters to assist

them with their common plan to travel to and occupy Canada's capital, and to seriously interfere with the rights of the Plaintiffs and the class members.

87. The Organizer Defendants and the Trucker Defendants also solicited donations personally to assist with their common plan to travel to and occupy Canada's capital, and to seriously interfere with the rights of the Plaintiffs.

88. The Donor Defendants are individuals who gave money to the online fundraising platform GiveSendGo from February 4, 2022 onwards, in order to provide material support to the ongoing activities of the Freedom Convoy participants in Ottawa, Ontario. By that time, it was notorious that the Freedom Convoy participants were occupying Ottawa and seriously disturbing and interfering with the rights of anyone in the downtown core, by blocking streets, idling large semi-trucks and blasting air horns and rail horns. The Donor Defendants gave money with knowledge that the Freedom Convoy participants, including the Trucker Defendants, were committing the tortious acts and unlawful behaviour described further below, with the intention of facilitating these acts to achieve the common goal of coercing governments to withdraw COVID-19 public health measures.

89. The Defendants discussed the common goals that they hoped to achieve by organizing the Freedom Convoy, which included forcing Prime Minister Justin Trudeau and the federal government to announce an immediate repeal of all COVID19 public health measures.

90. The Defendants discussed and coordinated plans for how they would occupy Ottawa and how they would attempt to reach their common goals. The Organizer Defendants discussed setting up a "war room" to further strategize once they reached Ottawa.

91. One of the main tactics coordinated by the Defendants, in support of their goal of forcing the federal government to capitulate to their demands, was for Freedom Convoy participants to make as much noise as possible when stationed in Ottawa's downtown. To make that noise, the Organizer Defendants planned, organized,

encouraged and directed Trucker Defendants and other Freedom Convoy participants to continuously blast the horns of their vehicles, as described further below. The Organizer Defendants also planned, organized, encouraged and directed Trucker Defendants and other Freedom Convoy participants to occupy Ottawa streets continuously with their vehicles running 24 hours per day.

SETTING UP IN OTTAWA AND CREATING THE OCCUPATION ZONE

92. Starting on or around Friday, January 28, 2022, Freedom Convoy vehicles started to arrive in Ottawa. These vehicles included tractor trailers, tractors with no trailers, passenger vehicles, and large recreational vehicles (“RVs”).

93. When they arrived in Ottawa, as planned the Freedom Convoy vehicles began to congregate and to block many of the streets surrounding Parliament Hill and in the surrounding neighbourhoods.

94. Several hundred vehicles have remained camped out in Ottawa’s downtown since January 28, 2022, lined up bumper-to-bumper. The clusters of vehicles are predominantly concentrated on Wellington Street, Rideau Street, Kent Street, Bank Street, Metcalfe Street, Elgin Street, Laurier Avenue West, Laurier Avenue East, King Edward Avenue and Waller Street. On some days, particularly on weekends, many other trucks and vehicles join the Convoy occupation, with trucks blocking many other downtown Ottawa streets for days at a time.

95. The blockade renders it impossible or almost impossible for other vehicles to pass through the downtown Ottawa core.

96. In furtherance of the common design of the Defendants, the trucks remain running all day and night, with other Freedom Convoy participants organizing the delivery of fuel in jerry cans, food, and other supplies to the drivers. The Organizer Defendants Tiessen, King, Mihilewicz, Enns, Jansen, LaFace, Belton and Bulford have been responsible for organizing and coordinating the delivery of supplies to drivers.

97. These large vehicles have remained idling or running 24 hours per day, emitting noxious diesel fumes, particulates and gases.

PLANNING AND LOGISTICS

98. In furtherance of their common design, the Organizer Defendants have set up staging areas to stockpile fuel and other supplies for the occupying trucks, and to arrange and coordinate their delivery. For logistical reasons, the Organizer Defendants established these staging areas outside of the Ottawa downtown core. The Organizer Defendants Bulford and Marazzo relied on their military and police skills and expertise to manage these logistics, which are designed to avoid, frustrate or thwart any effort by authorities to break the supply lines of fuel and food to the truck drivers blocking Ottawa streets.

99. The Freedom Convoy staging areas or camps were established by the Organizer Defendants at 300 Coventry Road (RCGT Park and 1500 Bronson Avenue (the RA Centre).

100. In furtherance of their common design, the Defendants established communication lines between each other and with all the participants in the Freedom Convoy Occupation. The Organizer Defendants often communicate to the occupation participants through live stream videos on various social media channels, including Facebook, Youtube, Tiktok and Telegram. The Defendants also communicate with each other through other applications such as Zello.

101. In furtherance of their common design, the Organizer Defendants established a “war room” in downtown Ottawa to meet, plan and discuss the strategy, funding, tactics and logistics of the ongoing occupation. The war room is set up in one of the downtown Ottawa hotels, and moves occasionally. It was initially set up in the Holiday Inn at 402 Queen Street, but later moved to the Arc Hotel at 140 Slater Street. Freedom Convoy occupiers in need of food, lodging or other supplies contact the war room to request financial and logistical support.

102. The raising, collection and disbursement of funds to support the unlawful activities of the Freedom Convoy participants are the primary means by which the common design is effected by the Defendants. The Organizer Defendants expressly raised and disbursed funds to support the indefinite truck blockade of public streets and roadways, the non-stop idling of trucks and associated air pollution, and the extreme and incessant honking.

103. The Defendant corporation Freedom 2022 was established by the Organizer Defendants on its board of directors to raise funds through donations to GiveSendGo, an online donation platform. The funds held by the Defendant Freedom 2022 were raised expressly to support the unlawful activities of the Trucker Defendants and other Freedom Convoy participants.

104. The Defendants St. Louis and Barber established a Bitcoin fundraiser on or about February 11, 2022 to raise funds to reimburse the Trucker Defendants for expenses, food, fuel, and repairs to encourage them to remain in Ottawa and continue their unlawful activities and tortious behaviour.

105. The Defendant King established a cryptocurrency token on or about February 11, 2022 to raise funds to reimburse the Trucker Defendants for expenses, food, fuel, and repairs to encourage them to remain in Ottawa and continue their unlawful activities and tortious behaviour.

106. The Donor Defendants have contributed funds to the Freedom Convoy through various means with knowledge that the Freedom Convoy participants are engaging in the tortious and other unlawful behaviour described herein, and with the intention of supporting and facilitating these acts with those financial donations.

HORN TACTIC AND OTHER EXTREME NOISE

107. In furtherance of the common design of the Defendants, one of the main protest tactics employed by the Trucker Defendants and other Freedom Convoy

participants has been to make as much noise as possible to disturb individuals in Ottawa's downtown.

108. In furtherance of their common design, the Organizer Defendants planned, organized, encouraged and directed the Trucker Defendants and other Freedom Convoy participants to blast the horns on their vehicles, non-stop, for several hours every day.

109. The Defendants coordinated their horn-blasting tactic via social media channels, including Facebook and YouTube, and via the walkie-talkie app Zello.

110. As one example of this, on January 31, 2022, the Defendant King posted a YouTube video instructing all Freedom Convoy "truckers" to collectively honk for ten minutes straight every hour and half hour.

111. Initially, this honking would last from approximately 7AM to 1AM. On or around February 1, 2022, a new timeframe was coordinated for the honking, which now occurs from approximately 8AM to 11PM.

112. The Defendants have taken to social media and Zello to celebrate the honking and to encourage participants to continue employing this tactic.

113. The types of horns that have been employed as part of the horn-blasting tactic include air horns, which are only to be used for safety warnings, and train horns.

114. Operator manuals for the types of horns being used by the Freedom Convoy provide warnings that they produce "extreme loudness" and can cause permanent hearing damage.

115. The Defendants are aware that the honking noise is extreme and can cause harm or distress. The Defendants organized, purchased and distributed ear plugs to protestors to protect themselves from the extreme sound levels of their horn tactic while it disturbed and caused harm to the class members.

116. The Organizer Defendants have also arranged for the purchase of fireworks and the rental or use of loud amplification systems.

117. The Organizer Defendants encouraged, directed or permitted Freedom Convoy participants to discharge fireworks in downtown Ottawa at all hours of the night. The fireworks are discharged on city streets in dangerously close proximity to buildings where Resident Subclass Members reside.

118. The Organizer Defendants have encouraged and allowed the loud amplification systems to blast music at excessively loud levels until late at night for every night of the occupation. In furtherance of the common design, the Organizer Defendants wanted to cause as much discomfort and sleep deprivation to the Resident Subclass Members as possible.

DEFENDANTS' CONDUCT IS UNLAWFUL

119. The Plaintiffs plead that the Defendants' ongoing and concerted horn-blasting tactic is unlawful.

120. The Defendants' conduct is clearly prohibited by sections 2, 3 and 15 of the City of Ottawa Noise By-Law, By-Law No. 2017-255.

121. Section 2 of By-Law No. 2017-255 states that no person shall cause or permit any bass noise, unusual noise or noise likely to disturb the inhabitants of the City.

122. Section 3 of By-Law No. 2017-255 states that no person shall cause or permit the ringing of any bell, sounding of any horn, or shouting in a manner likely to disturb the inhabitants of the City.

123. Section 15 of By-Law No. 2017-255 states that no person shall cause or permit unnecessary motor vehicle noise such as the sounding of the horn, revving of engine and the squealing of tires of any motor vehicle on any property other than a highway.

124. The Defendants' horn-blasting tactic also violates subsection 75(4) of the *Highway Traffic Act*, R.S.O. 1990, c. H. 8, which prohibits unnecessary noise.

Pursuant to subsection 75(4), a person having control or charge of a motor vehicle is prohibited from sounding any bell, horn or other signalling device so as to make an unreasonable noise, and is also prohibited from causing a motor vehicle to make unnecessary noise.

125. The level of noise emitted by the Defendants also exceeds the noise levels that would be permitted in a workplace setting, contrary to the Federal Occupational Health and Safety Regulations, SOR/86-304 enacted pursuant to the *Canada Labour Code*, RSC, 1985 c. L-2 and contrary to the Ontario Noise Regulation 381/15 enacted pursuant to the *Occupational Health and Safety Act*, RSO 1990, c 01.

126. The Defendants' horn-blasting also constitutes conduct that violates the *Criminal Code of Canada*, RSC 1985, c C-46 pursuant to sections 430(1)(d) (Mischief), 175(1)(d) (Cause Disturbance), and 180(1)(s) (Common Nuisance).

127. Exposure to loud noise for a prolonged period of time and sleep deprivation are both techniques that have been found to constitute torture, and are considered to be cruel, inhumane and degrading treatment under international law.

128. In addition to the horn-blasting tactic, the Defendants have engaged in other unlawful activity with respect to idling, blocking roads, noise, and fireworks. The Defendants' conduct in this regard is unlawful, as it violates following By-Laws of the City of Ottawa: Use and Care of Roads By-law 2003-498; Idling Control By-Law 2007-266; Noise By-Law 2017-255; Fireworks By-law 2003-237 and Encroachment By-Law 2003-446.

129. The Defendants' conduct with respect to the continuous idling of their vehicles and emission of noxious diesel fumes also constitutes a violation of section 75(4) of the *Highway Traffic Act*. Under this section, a driver of a motor vehicle shall not permit any unreasonable amount of smoke to escape from the motor vehicle.

130. The Defendants conduct in blocking public roads and streets without a permit is in violation of City of Ottawa By-laws. While blocking roads and streets may be exempt from By-laws as a protected activity where doing so is in the course of exercising the freedoms of peaceful assembly, association and expression under sections 2(a), (c) and (d) of the *Canadian Charter of Rights and Freedoms*, extended blocking of traffic over a prolonged period in a serious and sustained manner is unreasonable and unjustifiable, particularly when it is accompanied by tactics and behaviour that are not peaceful, such as extremely loud noise meant to cause harm.

IMPACT ON RESIDENT SUBCLASS

131. When walking within 50 feet of the semi-trucks blasting their air horns, the sound pressure decibel level is between 100 and 105 constantly. When the train horns on the semis are blasted, the decibel level increases to 120 to 125.

132. Fireworks can be staggeringly loud, with decibel levels between 120 and 150. Though short in duration, fireworks are so loud that they can damage hearing.

133. For individuals who live in residences beside the streets where the horns are blasting, the sound within the home is approximately 80 to 85 decibels.

134. The normal sound in a home is 35 to 40 decibels. A normal conversation is 55 to 65 decibels. A lawn mower can be 88 to 94 decibels. Sleep is best at 30 decibels or below and there can be significant interference with sleep when sound level decibels exceed 45.

135. Each 10 decibel increase in sound level equates to a doubling of the sound in the listener's perception. An increase of 20 decibels is a fourfold increase.

136. Hearing damage can occur at 90 decibel sound pressure level where the exposure is over 30 minutes. At 100 decibels, sound pressure can cause hearing

damage in about 15 minutes; at 120 decibel sound pressure and above hearing damage can occur in a matter of seconds.

137. Prolonged exposure to sound levels of 70 decibels and above can cause psychological distress and interfere with psychological integrity. Prolonged exposure to high sound levels has been used as a method of torture.

138. The truck horns are causing moral and psychological harm to the Resident Subclass Members. The horns are substantially interfering with the private use and enjoyment of their homes. With horns ending as late as 1am, and no earlier than 11pm, Resident Subclass Members are experiencing significant sleep disturbances.

139. For the Resident Subclass Members, the use of fireworks and sound amplification systems are further interfering with the private use and enjoyment of their homes. The fireworks have been discharged by Freedom Convoy participants as late as 3am on some nights. For Resident Subclass Members with post traumatic stress disorder and other mental health issues, the unexpected fireworks can be especially distressing and harmful.

140. Resident Subclass Members who leave their homes for work, school, groceries, medical appointments or necessities experience significantly elevated sound exposure on the street. Some Resident Subclass Members are avoiding going out as much as possible and are prisoners in their own homes. Others have been forced to leave their homes and find alternate accommodation. The Resident Subclass Members are living in daily torment caused by the incessant blasting of truck horns.

141. Resident Subclass Members are sometimes impeded from leaving their homes due to gridlock on their streets caused by the Convoy occupation vehicles. This is causing Resident Subclass Members to miss or be late for work, school and appointments.

142. Resident Subclass Members are also experiencing significant difficulty from the diesel fumes of the congregated semi-trucks. There are approximately 300 to 500 semi-trucks in the Occupation Zone at any time, idling their engines and emitting diesel fumes that negatively impact the health and well-being of the Resident Subclass Members.

IMPACT ON BUSINESS SUBCLASS

143. Businesses located in the Occupation Zone have suffered significant income losses due to the public nuisance created by the Defendants.

144. As a result of the blocked roads, loud and constant noise, and emission of diesel fumes, many businesses within the Occupation Zone have been forced to close.

145. For those businesses that have remained open during the Convoy occupation, they have experienced a loss of revenue as a result of customers avoiding the businesses within the Occupation Zone.

IMPACT ON EMPLOYEE SUBCLASS

146. Individuals employed by businesses located in the Occupation Zone have also suffered significant income losses due to the public nuisance created by the Defendants.

147. As a result of the blocked roads, loud and constant noise, and emission of diesel fumes, many businesses within the Occupation Zone have been forced to close. While some businesses have remained open, those businesses have experienced fewer customers.

148. Employee Subclass Members have either been unable to work, or unable to work usual hours, as a result of the Defendants' conduct. This has resulted in wage losses for Employee Subclass Members.

PERSONAL EXPERIENCE OF PLAINTIFF LI

149. The Plaintiff Li, a resident of the Centretown neighbourhood in the heart of downtown Ottawa, has suffered mental distress, suffering and torment as a result of the persistent and loud honking from several large trucks which have been camped outside of her residence since Friday, January 28, 2022.

150. While some of the honking sounds are from regular sized motor vehicle horns, the loudest and most persistent honks have come from large transport trucks. Some of these trucks are equipped with horns that emit loud honking noises typical of vehicles of their size. A number of the trucks are equipped with horns which are similar in tone and volume to train horns.

151. From within her unit, the sound of all three types of honking horns persist at regular and frequent intervals from morning to night, sometimes as late as 1:30 am. With the exception of some short periods of reprieve late in the night, the sound feels to the Plaintiff as if it is nearly constant. The honking of the horns is frequently accompanied by loud music, sounds of shouting and fireworks. The combination of these sounds makes the Plaintiff feel as though she is living in a war zone.

152. The honking horns, in particular, have interfered with the sense of peace, safety and serenity which the Plaintiff previously enjoyed in her home. During the brief periods when the sound of honking horns subsides, the Plaintiff is unable to enjoy the relative quiet because she becomes riddled with anxious anticipation for the moment it will start up again. The Plaintiff has found this anxious anticipation almost as unbearable as the sounds of the horns themselves.

153. The Plaintiff has been unable to enjoy a restful night's sleep since the Freedom Convoy arrived in her neighbourhood. The only way the Plaintiff can fall asleep and

temporarily escape the noise is by playing music on external speakers at 70-80% volume and then inserting noise-cancelling earphones or earplugs into her ears.

154. The Plaintiff is fearful every time she ventures outside. She does not leave her residence without first inserting noise-cancelling headphones into her ears. Even with these devices in her ears, the Plaintiff can still hear the sounds of the honking horns very clearly. The sound is so loud that she can physically feel vibrations inside her ears.

155. When the Plaintiff ventures outside, she is almost immediately subjected to heckling by members of the Freedom Convoy, yelling at her to remove the mask she wears to protect herself and others from contracting COVID-19. When she ignores the heckles, members of the Convoy respond by honking their horns which invariably causes the Plaintiff to flinch. When the Plaintiff flinches, the hecklers cheer loudly.

156. Since Friday January 28, 2022, the Plaintiff has contacted the Ottawa Police Service on at least 14 occasions to complain about the noise and the distress it is causing her. In response to her calls, she has either been told that there's nothing that can be done or that there are officers on the ground who will address the issue, but no one ever comes and the noise continues unabated. The sense that police are impotent to enforce law and order has contributed to the Plaintiff's fear and anxiety which are further exacerbated by the intolerable levels of noise.

157. The Plaintiff loves her community and is heartbroken by the trauma that is being inflicted on her and her neighbours.

EXPERIENCE OF THE PLAINTIFF HAPPY GOAT COFFEE COMPANY

158. The representative Plaintiff Happy Goat Coffee Company Inc. is a company incorporated pursuant to the *Canada Business Corporations Act*, RSC 1985, c C-44. ("Happy Goat"). The Plaintiff Happy Goat is an Ottawa business that purchases direct

trade coffee, roasts the beans locally, and operates several coffee kiosk and café locations in and around Ottawa.

159. The Plaintiff Happy Goat operates a café at 229 Rideau Street, which is located in the Occupation Zone. Six workers are employed at that location. On Friday, January 28, 2022, large commercial trucks with the Freedom Convoy began converging on Ottawa. One of the main routes the trucks followed to enter downtown Ottawa was along Rideau Street, right in front of this Happy Goat location. The trucks were loud and regularly blasting their air horns. By the evening, the trucks had blockaded Rideau Street.

160. Given the regularly blasting horns, the blockaded street, and the diesel fumes, the Happy Goat owners decided to close the Rideau Street café out of concern for the safety of employees. Unfortunately, Happy Goat was forced to lay off the employees.

161. Prior to closing the Rideau Street location, the Plaintiff Happy Goat expected \$600 to \$700 revenue per day, or approximately \$300 profit. Rideau Street has remained blocked by trucks throughout the Freedom Convoy occupation and the café at this location has not re-opened.

162. The Plaintiff Happy Goat also operates a coffee kiosk at the Rideau Station on the O-Train Confederation Line under the Rideau Centre mall. This is within the Occupation Zone and four workers are employed at this location. The Rideau Centre is at the corner of Rideau Street and Sussex Drive, which is close to some of the main Freedom Convoy activities. There are trucks and other blockages in the road, loud honking, and diesel fumes emitting from the trucks that remain idling all day and night.

163. On Saturday, January 29, 2021, the Rideau Centre decided to close the mall because of the safety concerns associated with the Freedom Convoy encampment outside its doors. The Happy Goat kiosk also closed that same day.

164. Prior to closing the Rideau Station coffee kiosk, the Plaintiff Happy Goat expected \$400 to \$600 in revenue per day, or approximately \$250 in profit. Rideau Street has remained blocked by trucks throughout the Freedom Convoy occupation and the kiosk at this location has not re-opened.

165. The Plaintiff Happy Goat also operates a café in the National Gallery of Canada at 380 Sussex Drive, which is located in the Occupation Zone. Six workers are employed at that location. The National Gallery of Canada has remained closed due to the disturbances caused by the Freedom Convoy participants. Prior to this location being closed, the Plaintiff Happy Goat expected \$1,200 revenue per day, or approximately \$800 profit. Rideau Street has remained blocked by trucks throughout the Freedom Convoy occupation and the café at this location has not re-opened.

EXPERIENCE OF THE PLAINTIFF UNION: LOCAL 613

166. The representative Plaintiff, 7983794 Canada Inc., is a company incorporated pursuant to the *Canada Business Corporations Act*, RSC 1985, c C-44 operating under the name Union: Local 613 (“Union: Local 613”).

167. Ivan Gedz is the majority owner of Union: Local 613, a restaurant located at 315 Somerset Street West in the City of Ottawa within the area of the city most affected by the Freedom Convoy.

168. The impacts of the global COVID-19 pandemic, and the public health measures which have been implemented to address it, have been profound for many in the restaurant industry. From January 5, 2022, to January 31, 2022, Union Local 613 was closed to in-person diners in accordance with Provincial public health regulations.

169. On January 31, 2022, Mr. Gedz re-opened the restaurant to in-person diners at 50% capacity, as permitted by law.

170. When the Freedom Convoy arrived in Ottawa on January 28, 2022, and began its protest activities in downtown Ottawa, Mr. Gedz was concerned for the health and safety of his employees as well as the implications for his business.

171. While Union: Local 613 has remained open to in-person diners since January 31, 2022, the impacts on the business have been profound. Mr. Gedz estimates that Union: Local 613's revenues have decreased from between 25% and 50% of what he would have expected to earn in the context of Provincial regulations limiting in-person dining to 50% capacity.

172. Since reopening, Mr. Gedz has observed that throughout the week the restaurant gets fully booked with weekend reservations as he would expect based on his experience throughout the pandemic when the restaurant has been permitted to open. As the weekend approaches, however, and the disturbances with the Freedom Convoy continue to be unresolved, most if not all reservations made in the course of the week have been cancelled.

173. There are a number of ways in which the presence of the Freedom Convoy has had a negative impact on Union: Local 613's business. The noise from the persistent honking of horns, particularly on weekends, can be heard inside the restaurant. Diners looking for a quiet, peaceful dining experience are deterred from attending restaurants in the affected areas. At times, vehicles participating in the Freedom Convoy have paraded down Somerset Street West, passing by Union: Local 613 while honking their horns. This has created an unwelcoming atmosphere for prospective diners.

174. Furthermore, the two parking lots most proximate to Union: Local 613 on the north and south sides of Somerset Street West between O'Connor Street and Bank Street have been fully occupied all night by Freedom Convoy vehicles, making it difficult for diners to park their cars near the restaurant.

175. More generally, the presence of so many trucks in the downtown core has deterred prospective diners from surrounding communities from attending the area

because it is difficult to get around by car. Consequently, very few diners have attended Union: Local 613 since its January 31, 2022 reopening who don't reside in the immediate neighbourhood. The general atmosphere of chaos and lawlessness in the downtown core has people avoiding the area when they can.

PERSONAL EXPERIENCE OF GEOFFREY DEVANEY

176. The Plaintiff Devaney is employed full-time as a server at a restaurant located in the Byward Market. He has been employed at the same restaurant in various capacities for over five years.

177. The Plaintiff Devaney is compensated on the basis of an hourly wage plus tips. On a typical shift, tips account for approximately one half of his income.

178. Following a period of closure to in-person dining due to Provincial regulations, the restaurant re-opened on January 31, 2022. However, it quickly became apparent to the Plaintiff Devaney and the restaurant's management, that the enthusiastic return of in-person diners they had seen following previous periods of lockdown, was not materializing due to the presence of the Freedom Convoy in downtown Ottawa.

179. So few people were attending the restaurant that management made the decision to significantly reduce employees' scheduled shifts. There were not enough diners attending the restaurant to justify a full staffing complement.

180. The Plaintiff Devaney's shifts were cut by one half to two thirds. When he did work, he earned his regular wages but his income derived from tips was considerably reduced due to how few diners were attending the restaurant.

181. For example, on the Saturday before Valentine's Day, typically a busy day in the restaurant industry, the Plaintiff Devaney would typically serve 20-30 patrons in the course of his shift. On Saturday February 12, 2022, he only served two diners.

182. While at work, the Plaintiff Devaney and his co-workers have had to endure the sounds of the Freedom Convoy horns which can be heard from within the restaurant. This has created an unwelcoming environment for customers, many of whom have cancelled their reservations. In the 48 hours which preceded Valentine's Day, 40 customers cancelled their reservations. This is the most significant mass cancellation the Plaintiff Devaney has seen in his time working at the restaurant.

PRIVATE NUISANCE

183. The incessant blaring of the high decibel air horns and train horns substantially interferes with the private use and enjoyment of the Resident Subclass Members' homes and has caused serious physical and psychological harm. The conduct is totally unreasonable and unjustified.

184. The diesel fumes caused by hundreds of trucks idling 24 hours per day, congregated close together near residential homes and buildings, substantially interferes with the private use and enjoyment of the Resident Subclass Members' homes and has caused serious physical and psychological harm, particularly for those who are vulnerable with pre-existing respiratory illnesses. The conduct is totally unreasonable and unjustified.

185. The discharge of fireworks dangerously close to residential homes and buildings, at all hours of the day and night, substantially interferes with the private use and enjoyment of the Resident Subclass Members' homes and has caused serious physical and psychological harm, particularly for those who are vulnerable with pre-existing mental health issues or illnesses. The conduct is totally unreasonable and unjustified.

186. The use of loud amplification systems at high sound levels for several hours every night, for days and now weeks at a time, substantially interferes with the private use and enjoyment of the Resident Subclass Members' homes and has

contributed to the psychological harm experienced by many. The conduct is totally unreasonable and unjustified.

187. The activities described above, alone and in combination, constitute a private nuisance perpetrated on the Resident Subclass Members. The Organizer Defendants planned, encouraged, facilitated, supported, promoted and directed these activities amounting to private nuisance to be performed by the Trucker Defendants and other participants in the Freedom Convoy occupation. The Organizer Defendants' assistance and support for the tortious behaviour was substantial, including the planning of the tactics, providing the logistics and coordination, and raising and distributing funds for the express purpose of the continuation of the occupation of Ottawa and the related tortious behaviour.

188. The Organizer Defendants and the Trucker Defendants carried out the tortious private nuisance activities in concert with the common intention of causing discomfort, distress and harm to the Resident Subclass Members in order to pressure, compel and coerce the Government of Canada and other levels of government to meet their demands of withdrawing all COVID-19 public health measures and restrictions. The Defendants are all jointly and severally liable for the damages caused by the private nuisance carried out by any of them in furtherance of a common design.

PUBLIC NUISANCE

189. Since January 28, 2022, the Freedom Convoy occupiers, including the Defendants, have engaged in activities in the Occupation Zone that have constituted a serious attack on the public's right to live their lives unaffected by substantial interference with their own daily activities. The activities described below have unreasonably interfered with the public's interest in health, safety, comfort and convenience, amount to a public nuisance.

190. The Trucker Defendants and other Freedom Convoy participants blocked several downtown Ottawa public streets indefinitely with large trucks and other vehicles, rendering the streets impassable. The blockade has substantially interfered with people going to work, school, or appointments, and has made it made it difficult for emergency vehicles to attend those in need. The serious, sustained and prolonged manner of the blockade of public streets is unreasonable and is not an activity protected by the *Canadian Charter of Rights and Freedoms*.

191. The incessant blaring of the high decibel air horns and train horns in downtown Ottawa unreasonably interferes with the health, safety, and comfort of all subclass members and the public at large.

192. The diesel fumes caused by hundreds of trucks idling 24 hours per day, congregated close together on public streets in downtown Ottawa, unreasonably interferes with the health, safety, and comfort of all subclass members and the public at large.

193. The use of loud amplification systems at high sound levels on public streets for several hours every night, for days and now weeks at a time, unreasonably interferes with the health, safety, and comfort of all subclass members and the public at large.

194. The activities described above, alone and in combination, constitute a public nuisance perpetrated on the Resident Subclass Members, the Business Subclass Members and the Employee Subclass Members. The Organizer Defendants planned, encouraged, facilitated, supported, promoted and directed these activities amounting to public nuisance to be performed by the Trucker Defendants and other participants in the Freedom Convoy occupation. The Organizer Defendants' assistance and support for the tortious behaviour was substantial, including the planning of the tactics, providing the logistics and coordination, and raising and distributing funds for the express purpose of the continuation of the occupation of Ottawa and the related tortious behaviour.

195. The Organizer Defendants and the Trucker Defendants carried out the tortious public nuisance activities in concert with the common intention of causing discomfort, distress and harm to the the subclass members in order to pressure, compel and coerce the Government of Canada and other levels of government to meet their demands of withdrawing all COVID-19 public health measures and restrictions. The Defendants are all jointly and severally liable for the damages caused by the public nuisance carried out by any of them in furtherance of a common design.

DAMAGES SUFFERED BY RESIDENT SUBCLASS MEMBERS

196. As a consequence of the private nuisance and public nuisance by the Defendants, Resident Subclass Members suffered injury and damages including:

- (a) emotional and mental distress;
- (b) difficulty concentrating;
- (c) interference with quiet enjoyment of home;
- (d) headaches; and
- (e) difficulty sleeping.

197. The estimated damages per Resident Subclass Member is \$200 per day of the continued use of the unlawful horn tactic.

198. Some Class Members have incurred special damages for the cost of alternate accommodations and ear plugs, in an amount to be specified at a future date.

199. The Defendants all engaged in a common design to cause harm to the Resident Subclass Members in order to apply pressure on and coerce the Government of Canada, to withdraw COVID-19 public health measures. As such, all Defendants are jointly and severally liable for all damages claimed.

DAMAGES SUFFERED BY BUSINESS SUBCLASS MEMBERS

200. As a consequence of the public nuisance by the Defendants, the Business Subclass Members suffered loss of revenues and income. Customers were deterred by the loud horns and diesel fumes, and the streets and roadways impeded access. Some Business Subclass Members had to close entirely because of their proximity to the parked trucks. For Business Subclass Members that remained open or partially open, they experienced significantly reduced revenues.

201. The Defendants all engaged in a common design to cause unreasonable disruption to the rights of the Business Subclass Members in order to apply pressure on and coerce the Government of Canada, to withdraw COVID-19 public health measures. As such, all Defendants are jointly and severally liable for all damages claimed.

DAMAGES SUFFERED BY EMPLOYEE SUBCLASS MEMBERS

202. As a consequence of the public nuisance by the Defendants, many businesses in the Occupation Zone closed entirely or reduced their hours of operation and staff requirements. The Employee Subclass Members were laid off or experienced reduced hours of work. The Employee Subclass Members experienced damages in the form of loss of wages.

203. The Defendants all engaged in a common design to cause unreasonable disruption to the Employee Subclass Members in order to apply pressure on and coerce the Government of Canada, to withdraw COVID-19 public health measures. As such, all Defendants are jointly and severally liable for all damages claimed.

PUNITIVE DAMAGES

204. The Organizer and Trucker Defendants deliberately planned and coordinated tactics to block all the streets and roadways around Parliament Hill and the surrounding neighbourhoods, and to make as much noise and air pollution as possible to cause discomfort and distress for all Subclass Members in order to coerce the

governments to comply with their demands. The non-stop blaring horns, diesel fumes, unexpected fireworks, and loud sound systems blasting music have caused the Resident Subclass Members unbearable torment in the sanctity of their own homes. The Organizer and Trucker Defendants are aware or ought to be aware that these tactics can cause permanent physical damage and psychological harm. The Organizer and Trucker Defendants have acted with wanton disregard towards the residents, businesses and workers of Ottawa.

205. This high-handed and callous conduct of the Organizer and Trucker Defendants warrants the condemnation of this Honourable Court. Canada is a free and democratic society with a long tradition of peaceful protest and assemblies. The Defendants have abused those freedoms to cause serious harm to others, innocent bystanders to the Defendants' pursuit of their misguided political goals.

206. The Plaintiff proposes that this action be tried at the City of Ottawa, Ontario.

Dated this 4th day of February, 2022.

Fresh as Amended Claim issued ___ day of February, 2022.

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Ottawa, ON K2P 0W6

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LSO: 45305K

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Fax: (613) 232-2680

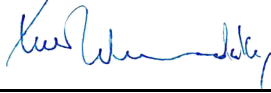
pchamp@champlaw.ca

This is Exhibit “SSSSS” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of

April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
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Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

MOTION RECORD OF THE MOVING PARTY
Motion for Interlocutory Injunction (Returnable February 16, 2022)

CHAMP & ASSOCIATES
Barristers and Solicitors
43 Florence Street
Ottawa, ON K2P 0W6

Per: Paul Champ
LSO: 45305K

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F: 613-232-2680
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AUTHORITIES

9	<i>Alberta Health Services v Pawlowski</i> , 2021 ABQB 493
10	<i>CNR v Chief Chris Plain</i> , 2012 ONSC 7356
11	<i>Foxgate Development Inc. v Jane Doe</i> , 2020 ONSC 5038
12	<i>MacMillan Bloedel Ltd v Simpson</i> , [1996] 2 SCR 1048

Court File No: CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PAT KING and
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Defendants/Responding Parties

**NOTICE OF MOTION
(Motion returnable February 16, 2022)**

The Plaintiff will make a motion to the Court on Wednesday, February 16, 2022, at 10:00 a.m., or as soon after that time as the motion can be heard, virtually by Zoom.

PROPOSED METHOD OF HEARING: The Motion is to be heard

- ☐ In writing under subrule 37.12.1(1) because it is uncontested;
- ☐ In writing as an opposed motion under subrule 37.12.1(4);
- ☐ In person;
- ☐ By telephone conference;
- ☒ By video conference.

THE MOTION IS FOR:

1. An Order varying the terms of the interlocutory injunction issued by this Honourable Court on February 7, 2022, to include additional terms as follows:
 - a. Enjoining and restraining any persons having Notice of the Order from ordering, requesting, inciting, counselling, promoting, or encouraging in any manner whatsoever, either directly or indirectly, via social media or otherwise, any person to use air horns or train horns in downtown Ottawa for as long as the Order is in effect; and
 - b. Requiring the Defendant King to communicate the Order through his social media and other channels to all persons they know who are or who have been participating in the Freedom Convoy Protest in Ottawa; and
 - c. Directing the Sheriff of the City of Ottawa to enforce the terms of this Order and directing the Ottawa Police Service and Ontario Provincial Police, as the case may be, to assist the Sheriff in enforcing the Order upon request, in accordance with 141 of the *Courts of Justice Act*, R.S.O. 1990, c. C-43.
2. An Order continuing the interlocutory injunction, on the varied terms described above, for a further period of sixty (60) days;
3. Costs of the motion in the cause; and
4. Such further and other relief as this Honourable Court may deem just.

THE GROUNDS FOR THE MOTION ARE:

1. The Defendants are engaged in a protest in downtown Ottawa called the Freedom Convoy 2022;
2. A key tactic of the protest has been for semi-tractor trucks to blast their air horns and train horns en masse and for prolonged periods in the vicinity of the Parliament Buildings;
3. The air horns and train horns are extremely loud and can cause permanent hearing damage;
4. The air horns and train horns have created sound levels of 105 to 120 decibels for prolonged periods;
5. Prior to the interlocutory injunction Order granted by this Honourable Court on February 7, 2022, the horn tactic had been used by the Defendants in Ottawa

for eleven days, causing significant disruption to the private use and enjoyment of the homes of the Plaintiff and the proposed Class Members;

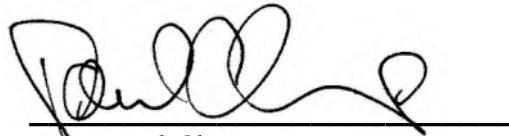
6. The horn tactic was organized and planned by the Defendants to cause serious discomfort and inconvenience to the Plaintiff and the Class Members in their private homes;
7. Prior to the interlocutory injunction Order granted by this Honourable Court on February 7, 2022, the Defendants had expressed their intention to continue the horn tactic indefinitely;
8. As a result of the interlocutory injunction Order granted on February 7, 2022, there was relatively little horn honking in downtown Ottawa for several days;
9. Since February 10, 2022, the horn honking in downtown Ottawa has resumed and intensified, in contravention of this Court's Order;
10. The Defendants Barber, Dichter and Lich have failed to communicate the Order through their social media and other channels to all persons they know who are or who have been participating in the Freedom Convoy Protest in Ottawa;
11. The Defendants Dichter and King have requested, counselled, and encouraged Freedom Convoy participants to breach the current Order;
12. Several hundreds of vehicles participating in the Freedom Convoy 2022 continue to occupy downtown Ottawa;
13. If the interlocutory injunction is not extended on the new terms sought, it is likely that the Defendants will continue and intensify their horn blasting in downtown Ottawa and that the Plaintiff and proposed Class Members will suffer irreparable harm;
14. The use of the horn tactic by the Defendants is unreasonable and substantially interferes with the use and enjoyment of the homes of the Plaintiff and the proposed Class Members;
15. The Defendants have been given notice of the existing Order, by publication of the Order online and by distributing copies to media and daily newspapers, in accordance with paragraph 8 of the Order;
16. Section 141(1) of the *Courts of Justice Act*, R.S.O. 1990, c. C-43 provides that orders of a court arising out of a civil proceeding and enforceable in Ontario shall be directed to a sheriff for enforcement;

17. Section 141(2) of the *Courts of Justice Act*, R.S.O. 1990, c. C-43 provides that a sheriff who believes that the execution of an order may give rise to a breach of the peace may require a police officer to accompany the sheriff and assist in the execution of the order.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the Motion:

1. The affidavit of Zexi Li;
2. The affidavit of Sean Flynn;
3. The affidavit of Trudy Moore; and
4. The affidavit of Jeremy King.

Date: February 15, 2022

A handwritten signature in black ink, appearing to read 'Paul Champ', written over a horizontal line.

Per: Paul Champ
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Solicitors for the Plaintiff

Court File No. CV-22-00088514-00CP

ZEXI LI

- and -

CHRIS BARBER, BENJAMIN
DICTER, TAMARA LICH, PATRICK KING and
JOHN DOES 1-60

Plaintiff (Moving Party)

Defendants (Responding Parties)

ONTARIO
SUPERIOR COURT OF JUSTICE

NOTICE OF MOTION
(Motion returnable February 16, 2022)

CHAMP & ASSOCIATES
Equity Chambers
43 Florence Street
Ottawa, ON K2P 0W6
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Solicitors for the Plaintiff



Court File No:

Electronically issued
Délivré par voie électronique : 04-Feb-2022
Ottawa

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ZEXI LI

Plaintiff

- and -

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
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Defendants

Proceeding under the *Class Proceedings Act, 1992*

STATEMENT OF CLAIM

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office,

WITHIN TWENTY DAYS after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM, and \$10,000 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and \$400 for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date: _____

Issued by: _____

Registrar
Court House,
161 Elgin Street
Ottawa, Ontario

TO: Chris Barber
Swift Current, Saskatchewan

AND TO: Benjamin Dichter
Toronto, Ontario

AND TO: Tamara Lich
Medicine Hat, Alberta

AND TO: Patrick King
Red Deer, Alberta

AND TO: John Doe 1 to John Doe 60

CLAIM

1. The Plaintiff, on behalf of the Class described herein, claims the following:
 - (a) an order certifying this action as a class proceeding and appointing the Plaintiff as the representative Plaintiff for the Class (as defined below);
 - (b) damages for private nuisance in the amount of \$4.8-million or any such amount that this Honourable Court deems appropriate;
 - (c) punitive damages in the amount of \$5-million;
 - (d) injunctive relief prohibiting the continuation of the nuisance;
 - (e) pre-judgment and post-judgment interest in accordance with the *Courts of Justice Act*, as amended;
 - (f) the costs of this action, including HST;
 - (g) the costs of notice and of administering the plan of distribution of the recovery in this action, plus applicable taxes, pursuant to section 26 of the *Class Proceedings Act*, 1992, S O 1992, c. 6; and
 - (h) such further and other relief as this Honourable Court may deem just.

OVERVIEW

2. Over the past two years, the COVID-19 pandemic has caused significant stress, severe illness, death and grief to every person in Canada. Over 33,000 Canadians have died from COVID-19 and thousands more suffer from its prolonged effects.
3. Governments at all levels across the country have adopted public health measures to prevent severe illness and death from COVID-19. These public health

measures have caused significant disruption to the lives of every Canadian. Despite this disruption, the vast majority of Canadians support public health measures, including vaccine mandates, because they believe these measures save lives.

4. A minority of Canadians are strongly opposed to these public health measures. The Defendants are among this minority. To express their political opposition to COVID-19 public health measures, the Defendants organized a “Freedom Convoy” of vehicles, including a large number of semi-trailer-tractor trucks, to travel from different parts of Canada and converge on the national capital of Ottawa.

5. The Defendants planned to organize a large demonstration in the vicinity of the Parliament Buildings in Ottawa. Like many protesters, they wanted their voices heard by political leaders. To ensure that happened, the Defendants designed a plan to block all the streets and roadways around Parliament and the surrounding neighbourhood, and make as much noise as possible and cause discomfort to the political leaders. To make that noise, the Defendants planned, organized, encouraged and directed “Freedom Convoy” participants to blast the horns on their vehicles, non-stop, for several hours.

6. As planned by the Defendants, the Freedom Convoy vehicles began to arrive in Ottawa in Ottawa on Friday, January 28, 2022. As planned by the Defendants, the Freedom Convoy protests formally launched on Saturday, January 29, 2022. Unlike most protests, the Freedom Convoy decided to stay and keep protesting, every day and night, until the Government of Canada met their demands of dropping all public health measures across Canada. The fact that public health measures are predominantly implemented by provincial governments has not deterred the Defendants. At the time this claim is issued, the protest remains ongoing.

7. A key tactic of the Freedom Convoy is blasting vehicle horns non-stop, all day. These horns include the air horns and train horns on the many semi-trucks. Air horns and train horns create an extremely loud noise as a warning. Air horns and train horns emit noise in the range of 100 to 150 decibels. These horns are not meant to be used

for longer than a few seconds because the sound levels are dangerous and cause permanent damage to the human ear. Despite these dangers, the Freedom Convoy trucks have been blasting these dangerous horns continuously for 12 to 16 hours per day.

8. The historical neighbourhood around the Parliament Buildings is home to approximately 24,000 residents. These residents are used to the inconvenience of large demonstrations and protests. Sometimes they even join in if they believe in the cause. These residents understand and respect the importance of democratic freedoms, including the freedoms of association, assembly and expression. But they have never experienced anything like the constant and excruciatingly loud horns of the Defendants' Freedom Convoy. For the approximately 6,000 residents who live closest to the protests, the non-stop blaring horns have caused unbearable torment in the sanctity of their own homes.

9. The Freedom Convoy horn protest organized by the Defendants has caused significant mental distress, suffering and torment to the Plaintiff and the proposed Class Members who live in the six-block radius around the main protest streets. The horn protest has substantially and unreasonably interfered with the private use and enjoyment of the Class Members' property.

PARTIES

10. The Plaintiff Zexi Li resides in Ottawa, Ontario, within five blocks of Parliament Hill. She is a 21-year-old public servant and graduate of the University of Ottawa.

11. The Defendant Chris Barber resides in Swift Current, Saskatchewan. He is one of the organizers of the Freedom Convoy. He is a truck driver, who owns a trucking company in Saskatchewan.

12. The Defendant Benjamin Dichter resides in Toronto, Ontario. He is one of the organizers of the Freedom Convoy. Dichter is a former Conservative Party of Canada candidate and a prominent supporter of the People's Party of Canada.

13. The Defendant Tamara Lich resides in Medicine Hat, Alberta. She is one of the organizers of the Freedom Convoy and frequently acts as a spokesperson on social media accounts associated with the Freedom Convoy. She is listed as the organizer of the Freedom Convoy's fundraiser on the crowdsourced fundraising platform GoFundMe. Lich is the Secretary for the Maverick Party, a western separatist group formerly known as Wexit Canada, and was also an organizer for the Yellow Vests Canada movement.

14. The Defendant Patrick King resides in Red Deer, Alberta. He is one of the organizers of the Freedom Convoy. King was a co-founder of Wexit Canada and an organizer for the Yellow Vest Canada movement.

15. John Does 1 to 60 are drivers of semi-trucks that are parked in the downtown Ottawa core during the Freedom Convoy protest, blasting air horns and train horns on their trucks as a form of protest. The identities of these truck drivers are unknown at the time of the issuance of the claim.

16. The Plaintiff brings this action pursuant to the *Class Proceedings Act, 1992* on her own behalf and on behalf of all other persons who reside within two blocks of the main protest streets.

17. The proposed members of the Class are:

all persons who reside in Ottawa, Ontario, from Bay Street to Elgin Street and Lisgar Street to Wellington Street.

ORGANIZING THE FREEDOM CONVOY PROTEST

18. In early January 2022, the Defendants began to organize a protest to express their political opposition to COVID-19 health measures. They discussed and created a common plan to have a “Freedom Convoy” of vehicles, including a large number of semi-trailer-tractor trucks, travel from different parts of Canada and converge in the national capital of Ottawa on January 29, 2022.

19. On or around January 14, 2022, the Defendants created a Facebook page called “Freedom Convoy 2022” which they described as a “meeting place to discuss logistics, organization and mobilization to restore our Freedoms”. Indeed, the Defendants used this Facebook page to discuss logistics, organization and mobilization for the Freedom Convoy.

20. On or around January 23, 2022, the Defendants also created a fundraising page for the Freedom Convoy on the crowdsourced fundraising website GoFundMe. The Defendant Lich is listed as the organizer of this GoFundMe page, and the Defendant Dichter is listed as a Team Member.

21. On their GoFundMe page, the Defendants discussed the logistics and organization for the Freedom Convoy and solicited donations from supporters to assist them with their common plan to travel to and occupy Canada’s capital.

22. The Defendants discussed the common goals that they hoped to achieve by organizing the Freedom Convoy, which included forcing Prime Minister Justin Trudeau and the federal government to announce a repeal of all public health measures.

23. The Defendants discussed and coordinated plans for how they would occupy Ottawa and how they would attempt to reach their common goals. They discussed setting up a command room or war room to further strategize once they reached Ottawa.

24. One of the main tactics coordinated by the Defendants, in support of their goal of forcing the federal government to listen to their demands, was for participants to make as much noise as possible when stationed in Ottawa's downtown. To make that noise, the Defendants planned, organized, encouraged and directed Freedom Convoy participants to continuously blast the horns of their vehicles, as described further below.

SETTING UP IN OTTAWA AND MAIN PROTEST STREETS

25. Starting on or around Friday, January 28, 2022, Freedom Convoy vehicles started to arrive in Ottawa. These vehicles included tractor trailers, tractors with no trailers, passenger vehicles, and large recreational vehicles ("RVs").

26. When they arrived in Ottawa, the Freedom Convoy vehicles began to congregate to block many of the streets surrounding Parliament Hill and in the Centretown neighbourhood.

27. Several hundred vehicles have remained camped out in Ottawa's downtown since January 28, 2022, lined up bumper-to-bumper. The clusters of vehicles are predominantly concentrated on the streets between Bay Street to Elgin Street and Laurier Avenue to Wellington Street.

28. For 24 hours per day, the semi-trucks have primarily remained lined and concentrated on Kent Street and Bank Street running north south, and on Wellington Street running east west. The trucks remain running all day and night, with other Freedom Convoy participants organizing the delivery of fuel in jerry cans.

HORN TACTIC

29. One of the main protest tactics employed by Freedom Convoy participants has been to make as much noise as possible to disturb individuals in Ottawa's downtown.

30. To make that noise, the Defendants planned, organized, encouraged and directed Freedom Convoy participants to blast the horns on their vehicles, non-stop, for several hours.

31. The Defendants coordinated their horn-blasting tactic with Freedom Convoy participants via social media channels, including Facebook and YouTube, and via the walkie-talkie app Zello.

32. As one example of this, on January 31, 2022, the Defendant King posted a YouTube video instructing all Freedom Convoy “truckers” to collectively honk for ten minutes straight every hour and half hour.

33. Initially, this honking would last from approximately 7AM to 1AM. On or around February 1, 2022, a new timeframe was coordinated for the honking, which now occurs from approximately 8AM to 11PM.

34. The Defendants have taken to social media and Zello to celebrate the honking and to encourage participants to continue employing this tactic.

35. The types of horns that have been employed as part of the horn-blasting tactic include air horns, which are only to be used for safety warnings, and train horns.

36. Operator manuals for the types of horns being used by the Freedom Convoy provide warnings that they produce “extreme loudness” and can cause permanent hearing damage.

DEFENDANTS’ CONDUCT IS UNLAWFUL

37. The Plaintiffs plead that the Defendants’ ongoing and concerted horn-blasting tactic is unlawful.

38. The Defendants’ conduct is clearly prohibited by sections 2, 3 and 15 of the City of Ottawa Noise By-Law, By-Law No. 2017-255.

39. Section 2 of By-Law No. 2017-255 states that no person shall cause or permit any bass noise, unusual noise or noise likely to disturb the inhabitants of the City.

40. Section 3 of By-Law No. 2017-255 states that no person shall cause or permit the ringing of any bell, sounding of any horn, or shouting in a manner likely to disturb the inhabitants of the City.

41. Section 15 of By-Law No. 2017-255 states that no person shall cause or permit unnecessary motor vehicle noise such as the sounding of the horn, revving of engine and the squealing of tires of any motor vehicle on any property other than a highway.

42. The level of noise emitted by the Defendants also exceeds the noise levels that would be permitted in a workplace setting, contrary to the Federal Occupational Health and Safety Regulations, SOR/86-304 enacted pursuant to the *Canada Labour Code*, RSC, 1985 c. L-2 and contrary to the Ontario Noise Regulation 381/15 enacted pursuant to the *Occupational Health and Safety Act*, RSO 1990, c 01.

43. The Defendants' horn-blasting also constitutes conduct that violates the *Criminal Code of Canada*, RSC 1985, c C-46 pursuant to sections 430(1)(d) (Mischief), 175(1)(d) (Cause Disturbance), and 180(1)(s) (Common Nuisance).

44. Finally, exposure to loud noise for a prolonged period of time and sleep deprivation are both techniques that have been found to constitute torture, and are considered to be cruel, inhumane and degrading treatment under international law.

IMPACT

45. When walking within 50 feet of the semi-trucks blasting their air horns, the sound pressure decibel level is between 100 and 105 constantly. When the train horns on the semis are blasted, the decibel level increases to 120 to 125.

46. For individuals who live in residences beside the streets where the horns are blasting, the sound within the home is approximately 80 decibels.

47. The normal sound in a home is 35 to 40 decibels. A normal conversation is 55 to 65 decibels. A lawn mower can be 88 to 94 decibels.

48. Sleep is best at 30 decibels or below and there can be significant interference with sleep when sound level decibels exceed 45.

49. Each 10 decibel increase in sound level equates to a doubling of the sound in the listener's perception. An increase of 20 decibels is a fourfold increase.

50. Hearing damage can occur at 90 decibel sound pressure level where the exposure is over 30 minutes. At 100 decibels, sound pressure can cause hearing damage in about 15 minutes; at 120 decibel sound pressure hearing damage can occur in a matter of seconds.

51. Prolonged exposure to sound levels of 70 decibels and above can cause psychological distress and interfere with psychological integrity.

52. The truck horns are causing moral and psychological harm to the Class Members. The horns are substantially interfering with the private use and enjoyment of their homes. With horns ending as late as 1am, and no earlier than 11pm, Class Members are experiencing significant sleep disturbances.

53. Class Members who leave their homes for work, groceries or necessities experience significantly elevated sound exposure. Some Class Members are avoiding going out as much as possible and are prisoners in their own homes. Others have been forced to leave their homes and find alternate accommodation. The Class Members are living in daily torment caused by the incessant blasting of truck horns.

PLAINTIFF'S PERSONAL EXPERIENCE

54. The Plaintiff, a resident of the Centretown neighbourhood in the heart of downtown Ottawa, has suffered mental distress, suffering and torment as a result of

the persistent and loud honking from several large trucks which have been camped outside of her residence since Friday, January 28, 2022.

55. While some of the honking sounds are from regular sized motor vehicle horns, the loudest and most persistent honks have come from large transport trucks. Some of these trucks are equipped with horns emit loud honking noises typical of vehicles of their size. A number of the trucks are equipped with horns which are similar in tone and volume to train horns.

56. From within her unit, the sound of all three types of honking horns from the persists at regular and frequent intervals from morning to night, sometimes as late as 1:30 am. With the exception of some short periods of reprieve late in the night, the sound feels to the Plaintiff as if it is nearly constant. The honking of the horns is frequently accompanied by loud music, sounds of shouting and fireworks. The combination of these sounds makes the Plaintiff feel as though she is living in a war zone.

57. The honking horns, in particular, have interfered with the sense of peace, safety and serenity which the Plaintiff previously enjoyed in her home. During the brief periods when the sound of honking horns subsides, the Plaintiff is unable to enjoy the relative quiet because she becomes riddled with anxious anticipation for the moment it will start up again. The Plaintiff has found this anxious anticipation almost as unbearable as the sounds of the horns themselves.

58. The Plaintiff has been unable to enjoy a restful night's sleep since the Freedom Convoy arrived in her neighbourhood. The only way the Plaintiff can fall asleep and temporarily escape the noise is by playing music on external speakers at 70-80% volume and then inserting noise-cancelling earphones or earplugs into her ears.

59. The Plaintiff is fearful every time she ventures outside. She does not leave her residence without first inserting noise-cancelling headphones into her ears. Even with these devices in her ears, the Plaintiff can still hear the sounds of the honking horns

very clearly. The sound is so loud that she can physically feel vibrations inside her ears.

60. When the Plaintiff ventures outside, she is almost immediately subjected to heckling by members of the Freedom Convoy, yelling at her to remove the mask she wears to protect herself and others from contracting COVID-19. When she ignores the heckles, members of the Convoy respond by honking their horns which invariably causes the Plaintiff to flinch. When the Plaintiff flinches, the hecklers cheer loudly.

61. Since Friday January 28, 2022, the Plaintiff has contacted the Ottawa Police Service on at least 14 occasions to complain about the noise and the distress it is causing her. In response to her calls, she has either been told that there's nothing that can be done or that there are officers on the ground who will address the issue, but no one ever comes and the noise continues unabated. The sense that police are impotent to enforce law and order has contributed to the Plaintiff's fear and anxiety which are further exacerbated by the intolerable levels of noise.

62. The Plaintiff loves her community and is heartbroken by the trauma that is being inflicted on her and her neighbours.

PRIVATE NUISANCE

63. The incessant blaring of the high decibel air horns and train horns substantially interferes with the private use and enjoyment of the Class Members' homes. The conduct is totally unreasonable and unjustified.

64. The Defendants Barber, Dichter, Lich and King have organized, planned, encouraged and directed the horn tactic by Defendants John Doe 1 to John Doe 60.

DAMAGES SUFFERED BY CLASS MEMBERS

65. As a consequence of the private nuisance by the Defendants, Class Members suffered injury and damages including:

- (a) emotional and mental distress;
- (b) difficulty concentrating;
- (c) interference with quiet enjoyment of home;
- (d) headaches; and
- (e) difficulty sleeping.

66. The estimated damages per Class Member is \$100 per day of the continued use of the unlawful horn tactic.

67. Some Class Members have incurred special damages for the cost of alternate accommodations and ear plugs, in an amount to be specified at a future date.

PUNITIVE DAMAGES

68. The Defendants deliberately planned the horn tactic to cause distress and discomfort to the Class Members and substantially interfere with the private enjoyment of their homes. The Defendants are aware or ought to be aware that the prolonged use of the extremely loud air horns and train horns can cause permanent hearing damage and psychological harm. The Defendants have acted with wanton disregard towards the residents of Ottawa.

69. This high-handed and callous conduct of the Defendants warrants the condemnation of this Honourable Court. Canada is a free and democratic society with a long tradition of peaceful protest and assemblies. The Defendants have abused those freedoms to cause serious harm to others, innocent bystanders to the Defendants' pursuit of their misguided political goals.

70. The Plaintiff proposes that this action be tried at the City of Ottawa, Ontario.

Dated this 4th day of February, 2022.

CHAMP & ASSOCIATES
Barristers and Solicitors
43 Florence Street
Ottawa, ON K2P 0W6

Per: Paul Champ
LSO: 45305K

Tel: (613) 237-4740
Fax: (613) 232-2680

pchamp@champlaw.ca

Court File No.

ZEXI LI

-and -

**CHRIS BARBER, BENJAMIN
DICTER, TAMARA LICH, PATRICK KING and
JOHN DOES 1-60
Defendants**

Plaintiff

**ONTARIO
SUPERIOR COURT OF JUSTICE**

STATEMENT OF CLAIM

Proceedings under the *Class Proceedings Act*,
1992

CHAMP & ASSOCIATES

Equity Chambers
43 Florence Street
Ottawa, Ontario K2P 0W6
Tel.: (613) 237-4740
Fax.: (613) 232-2680

Per: Paul Champ
LSUC#: 45305K
Email: pchamp@champlaw.ca

Solicitors for the Plaintiff

**ONTARIO
SUPERIOR COURT OF JUSTICE**

THE HONOURABLE MR JUSTICE MCLEAN) WEDNESDAY, THE 16TH DAY
)
) OF FEBRUARY, 2022

BETWEEN:

ZEXI LI

Plaintiff/Moving Party

- and -

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10,
JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15,
JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20,
JOHN DOE 21, JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25,
JOHN DOE 26, JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30,
JOHN DOE 31, JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35,
JOHN DOE 36, JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40,
JOHN DOE 41, JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45,
JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50,
JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55,
JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants/Responding Parties

DRAFT ORDER

THIS MOTION, made by the Plaintiff for an interlocutory injunction and costs, pursuant to section 101 of the *Courts of Justice Act* and Rule 40.01 of the *Rules of Civil Procedure*, was heard at Ottawa on February 5, 7, and 16, 2022 by videoconference.

UPON READING the motion records of the parties and **UPON HEARING** the oral arguments made by counsel for the parties by Zoom,

1. **THIS COURT ORDERS** that the interlocutory injunction granted on February 7, 2022, pursuant to section 101 of the *Courts of Justice Act*, Rule 40.01 of the *Rules of Civil Procedure*, and section 12 of the *Class Proceedings Act*, is continued.
2. **THIS COURT ORDERS** that any persons having notice of this Order are hereby restrained and enjoined from using air horns or train horns, other than those on a motor vehicle of a municipal fire department, in the geographic location anywhere in the City of Ottawa, in the vicinity of downtown Ottawa, being any streets north of Highway 417, otherwise known as the Queensway, for 60 days from the date of this Order.
3. **THIS COURT ORDERS** that any persons having notice of this Order are hereby restrained and enjoined from ordering, requesting, inciting, counselling, promoting or encouraging in any manner whatsoever, either directly or indirectly, via social media or otherwise, any person to use air horns or train horns in downtown Ottawa for as long as the Order is in effect.
4. **THIS COURT ORDERS** that the Defendants Barber, Dichter Lich, and King forthwith direct that they communicate this Order through their social media channels, including Twitter, Instagram, TikTok, Facebook, as well as the Freedom Convoy 2022 Facebook page.
5. **THIS COURT ORDERS** that any police officer with the Ottawa Police Service, and/or the appropriate police authority in the jurisdiction in question (the "Police"), shall have authorization to arrest and remove any person who has knowledge of this Order and who the Police have reasonable and probable grounds to believe is contravening or has contravened any provision of this Order.
6. **THIS COURT ORDERS** that the Police shall retain discretion:
 - a. as to the timing and manner of enforcement of this Order, and specifically retain discretion as to the timing and manner of arrest and removal of any person pursuant to this Order; and
 - b. to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has contravened, any provisions of this Order, upon that person agreeing in writing to abide by this Order.
7. **THIS COURT ORDERS** that any peace officer and any member of the Police who arrests or arrests and removes any person pursuant to this Order shall have authorization to release that person from arrest upon that person agreeing in writing to obey this Order;

8. **THIS COURT ORDERS** that this Order be directed to the Sheriff of the County of Ottawa for enforcement and directs the Ottawa Police Service, and any Police Service assisting the Ottawa Police Service, to assist the Sheriff in the enforcement of the order upon request, pursuant to section 141 of the *Courts of Justice Act*, R.S.O. 1990, c. C-43.
 9. **NOTICE OF THIS ORDER** may be given by: posting copies of this Order in or around downtown Ottawa; reading the Order to any person, including but not limited to reading the Order over an amplification system publishing this Order online, including on social media accounts associated with the Defendants, and by distributing copies of this Order to media including CBC, Radio-Canada, CTV, Global News and all daily newspapers in the Ottawa-Gatineau area.
 10. **THIS ORDER** shall not apply to persons acting in the course of or in the exercise of a statutory duty, power or authority.
 11. **THIS COURT ORDERS** that the costs of this motion shall be in the cause.
-

Court File No. CV-22-00088514-00CP

ZEXI LI

- and -

CHRIS BARBER, BENJAMIN
DICTER, TAMARA LICH, PATRICK KING and
JOHN DOES 1-60

Plaintiff (Moving Party)

Defendants (Responding Parties)

ONTARIO
SUPERIOR COURT OF JUSTICE

DRAFT ORDER

CHAMP & ASSOCIATES
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43 Florence Street
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Tel.: (613) 237-4740
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Per: Paul Champ
LSUC#: 45305K
Email: pchamp@champlaw.ca

Solicitors for the Plaintiff

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10,
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JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55,
JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT OF ZEXI LI

I, ZEXI LI, of the City of Ottawa, in the Province of Ontario, AFFIRM:

1. I am the representative Plaintiff in this proposed class action and the moving party in this motion. As such, I have personal knowledge of the matters to which

I hereinafter depose except where I have stated my evidence to be on information and belief, in which case I have indicated the source of my information and my belief in the truth of the information.

2. I reside in the Centretown neighbourhood in the heart of downtown Ottawa.
3. Starting on Friday, January 28, 2022 I began experiencing severe mental distress, suffering and torment as a result of persistent and loud honking from several large trucks which have been camped outside of my residence as a part of a so-called Freedom Convoy (the “Convoy”). I provided further details about the nature of this honking and its impact on me in a previous Affidavit sworn in this proceeding, dated February 4, 2022, attached hereto as **Exhibit “A”**.
4. On February 7, 2022, I observed the hearing of the motion for an interlocutory injunction in this proceeding by videoconference. I was watching this motion hearing when the Court granted the injunction Order, prohibiting the honking in downtown Ottawa for a period of 10 days.
5. At approximately 2:30PM on February 7, 2022, just before the Court issued its decision granting the injunction, I heard the honking outside my building intensify significantly.
6. Shortly after the Court granted the injunction, at approximately 3:10PM, one of my neighbours sent me a link to a Facebook Live video posted by the Defendant Patrick King (“King”) to “The Real Pat King” Facebook page: <https://fb.watch/b1dCQTIMAI/>. It is my understanding and belief, from my own

Facebook use, that “Facebook Live” videos are broadcast in realtime. The same video was also posted to the “Vidstorm” channel on YouTube:

<https://youtu.be/JROM-3fos7g>.

7. The broadcast of King’s Facebook Live video was timestamped as starting at 3:03PM on February 7, 2022, and lasting for 5 minutes and 46 seconds. The words “BREAK BREAK BREAK” appeared under the video on the Facebook page.
8. I watched King’s entire Facebook Live video from approximately 3:10PM to 3:16PM.
9. Starting around 0:10 into this Facebook Live video, King says he wants all truckers’ attention and tells them to “break break break”. He then makes the following statements throughout the video:
 - (a) Starting at approximately 0:28 in he states that he has a message that needs to go out to “every trucker, everybody on the Convoy” and that everybody needs to be “dead silent on the horns”;
 - (b) Starting at approximately 0:54 in he states that a Judge has issued an injunction against the horns for 10 days, and repeats that there needs to be “silence on the horns”;
 - (c) Starting at approximately 1:10 in he states, “This is their grounds to arrest you and pull you out of your trucks”;
 - (d) Starting at approximately 2:50 in he states, “For the next ten days, you cannot blast your horns. I understand it’s hard, we love them, we absolutely love them, but no more horns”;
 - (e) Starting at approximately 3:55 in he states, while laughing, “Remember, these people haven’t been able to sleep for 10 days. Okay, it’s kind of funny. I’m not going to laugh. I’m not going to lie, it’s pretty hilarious”
 - (f) Starting at approximately 4:07 in he states, “So now, you’ve got the citizens of Ottawa requesting the municipality of Ottawa to put in an injunction to stop the horns, and now they put an injunction in there. And

now they're asking for the Feds to come and negotiate and get us out of their city. It's working, it's working beautiful. It's awesome guys. I'm not laughing, you're laughing. It's kind of funny, it's kind of funny how we can hug and laugh and have a good time, and things are working. Ladies and gentlemen, from the bottom of my heart, great job out there. You're doing fantastic, let's keep up that great work. Let's keep up that enthusiasm"

(g) Starting at approximately 5:00 he repeats to "stop on the horns" and that "the injunction's been put in for 10 days".

10. At around 3:30PM on February 7, 2022, I noticed that the honking outside my building had stopped entirely.
11. From 3:30PM on February 7, 2022 to the morning of February 10, 2022, I did not hear very much honking occurring outside my building. I did hear occasional honking during this period, but it was generally fairly brief. It was nowhere near the same level of loud, continuous honking that was occurring before that. Instead of honking their horns, I noticed that the vehicles parked outside my building had started loudly and frequently revving their engines instead.
12. Starting on February 10, 2022, I began to hear more frequent horn honking downtown.
13. Around 9:00AM on February 10, 2022, I noticed a number of trucks leaving the spots they had been occupying for the past two weeks. For some of them, it was the first time I had seen them move. Around this time, I noticed some honking—not as intense as it had been before the injunction Order, but louder and more frequent than it had been for a few days.

14. On February 11, 2022, I heard more frequent honking outside my building. It was more intermittent during the day, but I noticed an increase in volume from the day before. At night, the honking started to become more constant again. There was notable honking around 8PM, and by 11PM the honking had returned in near full force. From 11PM to 12AM, there was near constant and loud honking, accompanied by revving, shouting (often through a megaphone) and sirens/alarms that would blare. I also heard fireworks throughout the night.
15. At 4AM on February 12, 2022, I was awoken by a loud alarm blaring outside. Throughout the day, the honking was very frequent. The train horns had returned, honking all of the time, notably around 12PM. Between 10AM and 12PM the honking was very frequent. By 2PM, the protesters were blasting music. Around 7PM there was very loud honking again, accompanied by sirens. Train horns blared throughout the day and most notably from 9PM to 9:20PM. I also heard fireworks throughout night.
16. The honking continued and intensified on February 13, 2022. It began around 10AM and continued throughout the day. Around 1PM, I watched a group of police officers walk past individuals honking and an open fire. I left downtown for a couple of hours between 2PM and 4PM, and when I returned, the honking was near constant. I could frequently hear train horns throughout the day.
17. There remains hundreds of large trucks in downtown Ottawa. I cannot count the number, but local news reports suggest there remains 400 trucks the several blocks surrounding the Parliament Buildings. Attached as **Exhibit "B"** is a story

18. I make this affidavit in good faith and for no improper purpose.



Christine Johnson
Champ & Associates

Zexi Li

[Handwritten signature]

This is **Exhibit “A”** referred to
in the Affidavit of **ZEXI LI**,
affirmed before me remotely
in accordance with O. Reg. 431/20
by video conference from the City of Ottawa,
in the Province of Ontario,
this 13th day of February, 2022.



A Commissioner for Taking Oaths, etc.

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10,
JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15,
JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20,
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JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55,
JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT OF ZEXI LI

I, ZEXI LI, of the City of Ottawa, in the Province of Ontario, AFFIRM:

1. I am the representative Plaintiff in this proposed class action and the moving party in this motion. As such, I have personal knowledge of the matters to which

I hereinafter depose except where I have stated my evidence to be on information and belief, in which case I have indicated the source of my information and my belief in the truth of the information.

2. I reside in the Centretown neighbourhood in the heart of downtown Ottawa. I first moved to Ottawa to pursue my post-secondary education at the University of Ottawa in the fall of 2017. In the course of my studies, I fell in love with the city and, in particular, the vibrant, multi-cultural community in which I currently reside.
3. I am informed by my review of the Ottawa Neighbourhood Study undertaken by the University of Ottawa and do believe that the population of Centretown is in the range of approximately 28,000 residents. I would estimate based on that number that there are approximately 5,000 to 6,000 residents in the vicinity of where I live, within a six block radius of Parliament Hill.
4. Since Friday, January 28, 2022 I have been experiencing severe mental distress, suffering and torment as a result of persistent and loud honking from several large trucks which have been camped outside of my residence as a part of a so-called Freedom Convoy (the "Convoy"). I understand from media reports that the Convoy is comprised of people who have converged on Ottawa to express their political opposition to COVID-19 public health measures.
5. While some of the honking sounds are from regular sized motor vehicle horns, the loudest and most persistent honks have come from large transport trucks. Some of these trucks are equipped with horns which emit loud honking noises

typical of vehicles of their size. A number of the trucks are equipped with horns which are similar in tone and volume to train horns. The train horns are as loud if not louder than anything I have ever heard.

6. From within my apartment, I have been inundated with the sounds of honking horns, including train-type horns, from morning to night, sometimes as late as 1:30 am. With the exception of some short periods of reprieve late in the night, the sound feels like it's nearly constant.
7. I downloaded an application on my mobile phone called Decibel X which measures sound levels. When the sounds of honking horns are at their peak, Decibel X has recorded sound levels as high as 84 decibels within my apartment.
8. I cannot overstate the extent to which the honking horns are affecting me emotionally. My nerves are frayed. I can't sleep. I don't feel the usual sense of peace, safety and serenity which I usually feel when I'm at home. During the brief periods when the sound of honking horns subsides, I can't even enjoy the moment of relative quiet because I become riddled with anxious anticipation for the moment it will start up again. Waiting for the next honk is almost as unbearable as the sound of the horns.
9. I have not had a restful night's sleep since the Convoy descended on my community. The only way I can fall asleep and temporarily escape the noise is by playing music on external speakers at 70%-80% volume and inserting noise-cancelling earphones or earplugs into my ears.

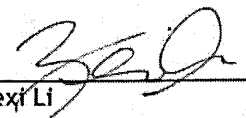
10. I am scared to go outside but I do venture out when necessary. Before leaving my residence, I insert noise-cancelling headphones into my ears. Nonetheless, the sound of honking horns is almost unbearable. I can physically feel the noise vibrating inside my ears.
11. When I do get up the courage to leave my apartment, I am almost immediately subjected to heckling my members of the Convoy who yell at me to remove the mask I wear to protect myself and others from contracting COVID-19. If I ignore the heckles, members of the Convoy respond by honking their horns at me. In response to the horns being honked in such close proximity to me I almost invariably flinch, causing the members of the convoy to cheer loudly and laugh at my expense. I have never felt so unsafe or demoralized in my neighbourhood.
12. Since Friday January 28, 2022, I have contacted the Ottawa Police Service on approximately 14 occasions to complain about the noise and the distress it is causing me, either by phone or by approaching officers on the street near my home. In response to my calls for help I have either been told that there is nothing that can be done or that the officers on the ground will address the issue but the noise continues unabated. The fact that the police are apparently impotent to enforce basic order in my neighbourhood, in a context where I feel that I and others are being actively harmed, is making me even more anxious and fearful.

- 5 -

13. I love my community so much and am proud to live here. I am heartbroken by the trauma that is being inflicted on me and my neighbours and by being made to feel like a prisoner in my own home by people who claim to stand for freedom.
14. I make this affidavit in good faith and for no improper purpose.

SWORN before me remotely)
 in accordance with O. Reg 431/20)
 by videoconference between)
 Ottawa, ON (commissioner))
 and Ottawa, ON (affiant))
 this 4th day of February, 2022)


 A commissioner for taking affidavits
 Christine Johnson
 Chang & Associates


 Zexi Li

**ONTARIO
SUPERIOR COURT OF JUSTICE**
**Proceeding commenced at
Ottawa**

AFFIDAVIT OF ZEXI LI

CHAMP AND ASSOCIATES
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Ottawa, ON K2P 0W6

Paul Champ
LSO 45305K

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Fax: 613 232-2680
pchamp@champlaw.ca

Solicitors for the Applicant

This is **Exhibit “B”** referred to
in the Affidavit of **ZEXI LI**,
affirmed before me remotely
in accordance with O. Reg. 431/20
by video conference from the City of Ottawa,
in the Province of Ontario,
this 13th day of February, 2022.



A Commissioner for Taking Oaths, etc.

Ottawa

Police negotiators convince some trucks to leave, but most won't budge

'Sophisticated level of demonstrators' remain in Ottawa as protest nears 3rd weekend

CBC News · Posted: Feb 10, 2022 8:50 AM ET | Last Updated: 30 minutes ago



Police struggle as Ottawa protesters employ new tactics

12 hours ago | 2:04

Ottawa police struggle to maintain control as protesters and their supporters employ new tactics and fortify a new supply camp. While on Parliament Hill, Conservatives soften their support and the federal government is pushed to find a solution. 2:04

The latest on Day 14 of the protest:

- ***Ontario government moves to freeze protest funding from GiveSendGo platform.***
- ***Conservatives [want all federal COVID restrictions dropped](#), and for demonstrators to leave.***
- ***[Ontario is skipping a protest meeting](#) with federal and city governments.***
- ***GoFundMe will [answer questions from MPs March 3 regarding protest fundraiser](#) on its website.***
- ***Ottawa's [Shepherds of Good Hope](#) has raised \$750K after being targeted.***

Through negotiation and towing enforcement, Ottawa police are trying to manage hundreds of trucks that remain in the city as part of a protest involving a "sophisticated level of demonstrators," the chief said Thursday.

Chief Peter Sloly said negotiators have managed to convince the drivers of 25 of more than 400 trucks to leave over the past 24 hours, including 12 from the Coventry Road encampment area and 10 more from Wellington Street in front of Parliament Hill.

Sloly said a team of police liaison officers and negotiators from across the province have been working on persuading protesters to leave by convincing them they "made their points" and they "are now suffering potential jeopardy for any unlawful activity."

- **[Governments talk as Ottawa businesses plead for urgent help](#)**
- **[Nurses hit with protest stress after 2 years of COVID](#)**

Sloly said 126 criminal investigations are underway and more than 400 hate incidents have been reported to the Ottawa Police Service's hotline, while 25 arrests have been made connected to the protest.

Sloly also said he hopes additional resources from the provincial and federal government will help convince more protesters to return home. That's especially prudent since it's not known how many more vehicles could return to Ottawa this weekend when the protest tends to grow and become more raucous.

Province moves to shut down fundraiser

Ottawa's protest has also led to copycat events across Canada at border crossings in [Windsor, Ont.](#), [Alberta](#) and a new demonstration [at the Manitoba-North Dakota](#) border.

Those events are currently funded partly through a fundraiser on the GiveSendGo online platform, but on Thursday the Ontario government moved to shut that down.

The government says an order was issued by the Ontario Superior Court to prohibit anyone donating or using "monetary donations made through the Freedom Convoy 2022 and Adopt-a-Trucker campaign pages on the GiveSendGo online fundraising platform."

"It binds any and all parties with possession or control over these donations," read a statement from Ford's office.

911 line jammed by mostly U.S. callers

Some of that money has come from the U.S., and at Thursday's news conference, Sloly explained how Americans have also targeted phone lines like 911 and the non-emergency phone number.

He said officials think the culprits "are supporting the core demonstrations here and across the country."

"They were coming in from the United States, not exclusively, but significantly from United States-based addresses," said Sloly.

These types of swatting and doxing efforts have consistently plagued police since the demonstration began, he added.

"These are tactics that we've seen deployed in other locations across North America, and they're being employed here."

Darryl Wilton, the head of the association representing Ottawa paramedics, said the swatting tactics are putting people's lives in danger and are more evidence the protests need to come to an end.

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"Somebody can call with a medical emergency that may not make it through to paramedics when the lines are saturated," he said.

"These are not patriots. These people should not be flying the Canadian flag. They're not doing anything to protect communities or Canadians."

Protesters circle Ottawa airport

Thursday began with a group of protesters who chose to hop in their vehicles and disrupt traffic at Ottawa's main airport for about two hours.

Traffic cameras showed a group of vehicles heading there around 8 a.m. ET and that group circled until around 10 a.m. before heading back to the nearby site on Coventry Road.



Protesters head to Ottawa airport, slowing traffic for two hours

24 hours ago | 0:42

A group of people protesting Canada's pandemic restrictions drove past the Ottawa airport Thursday, slowing traffic but otherwise having a minimal impact on operations, according to a statement from the Ottawa International Airport Authority. 0:42

More than 50 flights were still scheduled to arrive or leave when protest vehicles began to disrupt traffic.

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In a statement, the Ottawa International Airport Authority said there were about 60 to 70 vehicles involved and it had minimal effects on the airport.

Natalia Goodwin CBC 



@NataliaGoodwin

Right now at [#ottawa](#) airport pa convoy of protesters are driving the loop

Watch on Twitter

9:36 AM · Feb 10, 2022 

[Read the full conversation on Twitter](#)

 266

 Reply

 Share

[Read 84 replies](#)

"We are very disappointed that the protesters have chosen to disrupt an industry that has already been decimated by the pandemic."

Popular Now in News

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2 COMING UP LIVE**Protesters allow lane of traffic to open at Ambassador Bridge blockade**

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4 Ottawa close to removing pre-arrival COVID-19 test for fully vaccinated Canadians: sources

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5 Ontario court freezes access to funds raised for protest convoy on GiveSendGo platform

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RECOMMENDED FOR YOU**U.S. offers Trudeau government help to end border blockade**

Alexander Panetta

News - Politics

**Ottawa close to removing pre-arrival COVID-19 test for fully vaccinated Canadians: sources**

Sophia Harris

News - Business

**LIVE****Ford speaks as protest blockades continue in Ottawa, Windsor**

News - Canada - Toronto





Ottawa shelter 'blown away' by \$750K in donations after staff, residents harassed

News - Canada - Ottawa

'I had the run of the day': McMorris slams scoring in snowboard event won by fellow Canadian Parrot

Myles Dichter

Sports - Olympics - Winter Sports - Snowboard

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Visitez Radio-Canada.ca

ZEXI LI

47
-and-

BARBER, DICHTER, LICH, KING et al

Applicant

Respondents

Court File No. CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**Proceeding commenced at
Ottawa**

**AFFIDAVIT OF ZEXI LI
(SWORN FEBRUARY 13, 2022)**

CHAMP AND ASSOCIATES
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Paul Champ
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pchamp@champlaw.ca

Solicitors for the Applicant

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
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JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT OF SEAN FLYNN

I, SEAN FLYNN, of the City of Ottawa, in the Province of Ontario, AFFIRM:

1. I am a resident of Ottawa and concerned citizen. I reside in the New Edinburgh neighbourhood located approximately three kilometers from the core of

downtown. Since January 28, 2022, I have been regularly venturing around downtown Ottawa, by walking and cycling, to bear witness to the Freedom Convoy 2022 protest occupying the area. As such, I have personal knowledge of the matters to which I hereinafter depose except where I have stated my evidence to be on information and belief, in which case I have indicated the source of my information and my belief in the truth of the information.

2. I am aware that, on February 7, 2022, a Judge of the Ontario Superior Court of Justice granted an Order for an injunction, prohibiting the use of air horns and train horns in downtown Ottawa for a period of 10 days. I learned about this Order by receiving a “Breaking News” alert from the CBC app on my cell phone.
3. Before the injunction Order was granted, it was my observation that the horn honking in downtown Ottawa was extremely loud and constant.
4. Even from inside my residence in New Edinburgh, several kilometres away from downtown, I could hear the sound of honking horns very clearly from January 28, 2022 to the afternoon of February 7, 2022. On January 31, 2022 and February 1, 2022 I could hear the intermittent honking of horns over the course of almost 20 hours.
5. Troubled by reports I read in the media in which witnesses to the events unfolding near Parliament Hill claimed that the protests were not disruptive or particularly loud, which did not accord with what I was hearing from my residence several kilometers away, I decided to attend some of the locations where the trucks were situated in order to assess the situation for myself.

6. On January 30, 2022, I was walking in the vicinity of Rideau Street and Sussex Drive where the sound of honking horns was louder than anything I have ever heard.
7. On February 1, 2022, I walked from my home to Parliament Hill and arrived there at approximately 10:50PM. I was shocked by what I heard. The noise from assembled vehicles on Wellington Street was overwhelmingly and oppressively loud. The sound was so loud I could feel it reverberating throughout my entire body. The honking sounds were being emitted from many vehicles including transport trucks.
8. On February 5, 2022 I attended the intersection of Bank Street and Slater Street. Long rows of several large transport trucks were parked on each side of Slater Street. The trucks and vehicles were honking their horns so loudly that I received an alert on my Smart Watch which read: “[caution symbol] Loud- Repeated, long term exposure to sounds at this level can damage your hearing.”
9. After the injunction Order was granted on February 7, 2022, it was my observation that it became much quieter in downtown Ottawa for a few days. When walking and cycling downtown in the days that followed the granting of the Order, I had been listening for honking and did not really hear any.
10. Even at my home in New Edinburgh, I initially experienced relief from the sound of loud honking that could previously be heard from the protesters downtown. This had been a welcome change.

11. Unfortunately, starting on Friday, February 11, 2022, I again began to hear more regularly occurring honking of air horns and train horns downtown.
12. While walking downtown on Saturday, February 12, 2022, I witnessed a number of Freedom Convoy participants blatantly honking horns. Just before 5PM, I observed and recorded a video of a number of trucks parked at the intersection of Kent Street and Albert Street, revving their engines and intermittently honking very loud horns. At around 9PM, I observed a number of trucks parked at the intersection of Albert Street and O'Connor Street, and nearly every one of these trucks were honking loud horns at that time. My Smart Watch indicated sound levels of 101 dB when this honking was occurring.
13. It has been my observation that there are still many vehicles, including many large transport trucks, occupying the streets in the downtown core.
14. In some places, it appears to me as though the number of vehicles has grown. For instance, when I was walking downtown on February 9, 2022 between 12AM to 1AM, I observed that the vehicles had spread out as far the intersection of Kent Street and Cooper Street in Centretown.
15. I make this affidavit in good faith and for no improper purpose.

AFFIRMED before me remotely in
accordance with O. Reg. 431/20 by
video conference from the City of
Ottawa, in the Province of Ontario,
this 14th day of February, 2022.

A commissioner for taking affidavits



Christine Johnson
Champ & Associates



Sean Flynn

ZEXI LI

53
-and-

BARBER, DICHTER, LICH, KING et al

Applicant

Respondents

Court File No. CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**Proceeding commenced at
Ottawa**

AFFIDAVIT OF SEAN FLYNN

CHAMP AND ASSOCIATES
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pchamp@champlaw.ca

Solicitors for the Plaintiff/Moving Party

Court File No: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
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Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT OF TRUDY MOORE

I, TRUDY MOORE, of the City of Ottawa, in the Province of Ontario, AFFIRM:

1. I am a legal assistant at Champ & Associates, the law firm representing Zexi Li, the representative Plaintiff in this proposed class action and the moving party in

this motion. As such, I have personal knowledge of the matters to which I hereinafter depose except where I have stated my evidence to be on information and belief, in which case I have indicated the source of my information and my belief in the truth of the information.

2. I am aware that, on February 7, 2022, a Judge of the Ontario Superior Court of Justice granted an Order for an injunction (the "Injunction Order"), prohibiting the use of air horns and train horns in downtown Ottawa for a period of 10 days.
3. I am informed by Paul Champ and do believe that, on February 7, 2022, Mr. Champ sent copies of the Injunction Order to: Global News, CTV News, CBC, the Ottawa Citizen and the Ottawa Sun. Mr. Champ received replies from all of these organizations confirming receipt of the Order.
4. I am aware that the above-noted media and daily newspapers then published copies of the Injunction Order and/or reported on the terms of the Order in the following articles (attached hereto as **Exhibit "A"**):
 - (a) on February 7, 2022 Global News published an article reporting on the terms of the Order: "Trucker protest: Judge grants injunction against honking in downtown Ottawa", online at <https://globalnews.ca/news/8601005/ottawa-trucker-protests-injunction/>;
 - (b) on February 8, 2022, Global News published a further article reporting on the terms of the Order: "Trucker convoy: Here's what the 10-day

injunction against horns includes”, online at:
<https://globalnews.ca/news/8602756/freedom-convoy-injunction-what-does-it-mean/>;

- (c) on February 8, 2022, CTV News published an article reporting on the terms of the Order: “Meet the 21-year-old Ottawa woman who stopped the horns”, online at: <https://ottawa.ctvnews.ca/meet-the-21-year-old-ottawa-woman-who-stopped-the-horns-1.5772637>;
- (d) on February 7, 2022, CBC published an article reporting on the terms of the Order: ‘Court grants injunction to silence honking in downtown Ottawa for 10 days”, online at: <https://www.cbc.ca/news/politics/injunction-ottawa-granted-1.6342468>;
- (e) on February 8, 2022, the Ottawa Citizen published a copy of the Order within its article, “Judge orders truckers’ horns silenced for 10 days”, online at <https://ottawacitizen.com/news/local-news/judge-orders-truckers-horns-silenced>;
- (f) on February 8, 2022, the Ottawa Sun published a copy of the Order within its article, “Judge grants interim injunction against honking at Ottawa protest, online at <https://ottawasun.com/news/national/judge-grants-injunction-against-honking-in-downtown-ottawa>;

5. I am informed by Emilie Taman and do believe that, on February 10, 2022, Ms. Taman sent copies of the Injunction Order to le Droit and Radio-Canada by email. I am informed by Ms. Taman and do believe that both le Droit and Radio-Canada replied by email on the same date confirming that they have reported on the Injunction Order and its terms.
6. I am aware that le Soleil reported on the terms of the Injunction Order on February 7, 2022 (“Camionneurs: interdiction de klaxonner pendant 10 jours à Ottawa”, online at: <https://www.lesoleil.com/2022/02/07/camionneurs-interdiction-de-klaxonner-pendant-10-jours-a-ottawa-6d7a313cedff29eb2098a77549aa22a8>). I am also aware that Radio-Canada reported on the terms of the Order on February 7, 2022 (“Un juge accorde une injonction de 10 jours contre les klaxons des camionneurs”, online at: <https://ici.radio-canada.ca/nouvelle/1860411/injonction-provisoire-manifestation-camionneurs-klaxons-ottawa>). Copies of the articles published by le Droit and Radio-Canada are attached hereto as **Exhibit “B”**.
7. I am aware that there was further news coverage of the terms of the Injunction Order via television and/or radiobroadcasts by Global News, CTV News, CBC, Radio-Canada, and many other news media organizations within Canada and throughout the world.
8. As one example of such a radio broadcast, on February 8, 2022 CBC Radio’s Ottawa Morning program reported on the terms of the Order in the segment “Court grants injunction to silence honking in downtown Ottawa” (available

online at <https://www.cbc.ca/listen/live-radio/1-100-ottawa-morning/clip/15893808-court-grants-injunction-silence-honking-downtown-ottawa>). Included in this segment was a clip of CBC reporter Evan Dyer interviewing a Freedom Convoy participant about why the honking downtown had stopped. The individual being interviewed responded that Freedom Convoy participants had ceased their honking because of the Order, and that he “heard the instructions” not to honk.

9. I am aware that, on February 8, 2022, the Ottawa Police Service (“OPS”) published a news release on its website posting a copy of the Injunction Order. I am aware that the OPS also published a copy of the Order through its Twitter account, @OttawaPolice, on February 8, 2022: <https://twitter.com/OttawaPolice/status/1491194173206274050>. Attached hereto as **Exhibit “C”** is a copy of the OPS news release, attaching the Order.
10. I am informed by Bijon Roy and do believe that, on February 10, 2022, Mr. Roy sent a copy of the Injunction Order and Statement of Claim in this proceeding to the Defendant Patrick King (“King”) by email, to the email address publicly listed for King on the Freedom Convoy Canada website (<https://freedomconvoycanada.com/contacts>). Attached hereto as **Exhibit “D”** is a copy of the email and attachments sent to King on February 10, 2022.
11. I am informed by Bijon Roy and do believe that, at 5:06PM on February 10, 2022, Mr. Roy also sent a copy of the Injunction Order to King by SMS, to the cell phone number publicly listed for King on the Freedom Convoy Canada

website (<https://freedomconvoycanada.com/contacts>). I am informed and do believe that Mr. Roy received a response at 5:07PM stating “This isn’t how you serve documents”, to which he replied “All that is required is notice, not service”. A series of further responses was then received from Mr King’s cell phone number at 5:08PM, stating “This is a lie” and “100% fake”. Attached hereto as **Exhibit “E”** is a copy of the SMS exchange between our firm’s Zoom number and the Defendant King’s cell phone number.

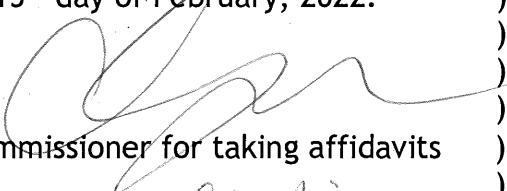
12. I am informed by Mr. Champ and do believe that, on February 13, 2022, Mr. Champ sent a letter to counsel for the Defendants Lich, Barber and Dichter, asking him to confirm whether his clients had communicated the Order in accordance with paragraph 3 of the Order. A copy of Mr. Champ’s letter to Keith Wilson is attached hereto as **Exhibit “F”**.
13. I am informed by Mr. Champ and do believe that, to date, Mr. Wilson has not confirmed whether his clients have complied with paragraph 3 of the Order.
14. I am aware that, on February 15, 2022 the Ontario Superior Court of Justice issued an Order restraining and enjoining persons with notice of the Order from directly or indirectly breaching Ottawa City By-Laws respecting: Open Air Fire; Fireworks; Noise; Use and Care of Roads; and Idling. A copy of the Court’s Order is attached hereto as **Exhibit “G”**.
15. In the time since the City’s injunction was granted, I have seen several posts on Twitter from Ottawa residents stating that the horn honking downtown has

continued nonetheless. Copies of such tweets are attached hereto as Exhibit "H".

16. I make this affidavit in good faith and for no improper purpose.

AFFIRMED before me in the City of)
Ottawa, in the Province of Ontario,)
this 15th day of February, 2022.)

A commissioner for taking affidavits)



Christine
Johnson

Champs+Associates



Trudy Moore

This is **Exhibit “A”** referred to
in the Affidavit of **TRUDY MOORE**,
affirmed before me in the City of Ottawa,
in the Province of Ontario,
this 15th day of February, 2022.



A Commissioner for Taking Oaths, etc.

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CANADA

Trucker protest: Judge grants injunction against honking in downtown Ottawa

By Mike Blanchfield and Laura Osman • The Canadian Press

Posted February 7, 2022 2:54 pm ▼



WATCH: 'This pandemic has sucked for all Canadians:' Trudeau



-A A+

An [Ontario](#) judge has granted a 10-day injunction to prevent protesting truckers in downtown [Ottawa](#) from honking their horns incessantly as the mayor of the national capital city asked for a near doubling of his police force.

Ottawa Mayor Jim Watson said in a letter to Prime Minister [Justin Trudeau](#) and Ontario Premier [Doug Ford](#) that the city needed 1,800 more officers, in addition to his current contingent of 2,100 police and civilian members, to “quell the insurrection” the local police cannot contain.

READ MORE: [Ottawa police, politicians seek swift end to trucker convoy](#)

Steve Bell, the city’s deputy police chief, said a person from Ohio was arrested in connection with a threat against Ottawa police headquarters in downtown Ottawa. He said threats are coming in from across North America, and they are very taxing on already stretched resources.

STORY CONTINUES BELOW ADVERTISEMENT

Watson said the city is keeping a tally of all extraordinary costs associated with the demonstrations and will seek compensation from higher levels of government when the protest finally ends. Ottawa police now say the demonstrations in the central core are costing the city \$1.8 million to \$2.2 million per day for police alone.

2:00

Is the trucker protest changing the perception of the C...

Is the trucker protest changing the perception of the Canadian flag?

The daily cost will only grow if Watson's plea for more officers is granted.

Ottawa's request for more policing help came as Ontario Superior Court Justice Hugh McLean granted a temporary injunction that could bring an end to the cacophony of horns heard in streets for more than a week.

McLean said his order was temporary because he needs to hear more evidence, but that he heard enough to make this ruling as a protest against COVID-19 pandemic measures continues to paralyze neighbourhoods around Parliament Hill.

STORY CONTINUES BELOW ADVERTISEMENT

2:10**Ottawa requesting more Ontario resources to end prot...**

Ottawa requesting more Ontario resources to end protests

Paul Champ, a lawyer representing central Ottawa residents in a proposed multimillion-dollar class-action lawsuit, argued the loud and prolonged honking is causing irreparable harm.

Keith Wilson, representing three of the respondents in the case, had told McLean the ruling on the injunction would carry national importance.

McLean said he heard enough evidence that the continual blaring of horns was having an effect on residents that their right for “quiet, if we can use that term,” trumped the honking truckers’ right to protest.

But McLean said the injunction was temporary because a “myriad of people” may still wish to come before the court to be heard.

1:07

‘Well past the time’ for trucker convoy protest in Ottaw...

‘Well past the time’ for trucker convoy protest in Ottawa to end, Blair says

An injunction is a court order that a person cease certain behaviour. If they don’t comply, they can be charged with contempt of court.

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Live blog: Trucker convoy protest enters 17th day in Ottawa

Ambassador Bridge border crossing remains closed as police arrest several protesters

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Watson said the loud honking that has reverberated through downtown Ottawa for the last nine days is “tantamount to psychological warfare.”

Amid blaring truck horns, the demonstration has included open fires, makeshift feeding stations, encampments and numerous _ sometimes profane _ antigovernment signs.

In his letter for more police resources, Watson wrote: “We need your help to end this siege in the heart of our nation’s capital and in our residential neighbourhoods, and to regain control of our city.”

Ottawa’s city council voted to formally petition the federal government to assume responsibility for public safety in the parliamentary precinct to free up Ottawa officers to return to protect residential neighbourhoods.

Council also voted to ask the provincial and federal governments to provide support for businesses and employees who have lost income during the demonstration, and social support services that have helped Ottawa’s most vulnerable through the disruptions.

Ford said Sunday the province has given Ottawa everything the municipality has requested, and will continue to do so.

Federal Transport Minister Omar Alghabra said Monday the provinces have “extensive regulatory powers” they can use to go after companies who are allowing their equipment to be used for the illegal occupation in Ottawa and near the U.S. border in southern Alberta.

He said provinces can use their highway safety laws to suspend the commercial licences and insurance of the owners of commercial trucks “blockading the streets, days on end, in a city or on a highway.”

STORY CONTINUES BELOW ADVERTISEMENT

“It’s clear blockades of streets and bridges is against the law and should bring serious consequences for the owners,” Alhabra said during a federal update on the ongoing events that included several cabinet ministers.

READ MORE: [Police arson unit probing alleged attempt to start fire in Ottawa apartment building, says mayor](#)

Alhabra urged the Ontario government to learn lessons from how convoys of anti-COVID-19 protesters were managed successfully in other provinces over the weekend.

In Quebec City, a protest wrapped up Sunday evening with police handing out 170 tickets for noise complaints, parking and highway safety code violations.

About a dozen large trucks and farm vehicles continued Monday to sit by the main entrance to the Manitoba legislature.

1:37

Trucker protests: Ottawa police chief pleads for additi...

Trucker protests: Ottawa police chief pleads for additional resources from all levels of government

Federal Public Safety Minister Marco Mendicino said an “angry crowd” should not be allowed to dictate policies to fight COVID-19, and that protesters have “crossed the line of acceptable conduct” toward fellow Canadians in their bid to pressure the government.

STORY CONTINUES BELOW ADVERTISEMENT

“We believe in peace, order and good government in Canada,” he said.
“Canadians deserve to feel safe in their communities and no one is above the law.”

Emergency Preparedness Minister Bill Blair said it is not the role of any government to direct law-enforcement operations but he announced that a trilateral table of federal, provincial and municipal partners would help oversee the response.

READ MORE: [Singh urging emergency debate in House amid trucker convoy ‘crisis’](#)

On Monday evening, Trudeau appeared in the House of Commons to take part in an emergency debate on the protest in Ottawa. It was his first time there since before the holiday break. Last week, he was isolating after having

tested positive in COVID-19. He has also been staying at a location in the National Capital Region that was not being publicized for security reasons.

“Everyone is tired of COVID, but these protests are not the way to get through it,” he said, adding that it was legitimate to protest but not to disturb people in the community.

New federal Conservative interim leader Candice Bergen responded by saying that Canada had never been so divided.

There have been numerous calls for the federal government to manage the protest response.

STORY CONTINUES BELOW ADVERTISEMENT

Some local politicians have called on Trudeau to take a more active role in the situation.

Earlier Monday, Bergen wrote to request a meeting with Trudeau and other party leaders to discuss the ongoing protest in Ottawa.

She charged the prime minister with being “largely absent” since dismissing protesters as a “fringe” with “unacceptable views” last week.

Bergen wrote she hopes the leaders can talk about how to “take the temperature down” and find solutions that would allow the people of Ottawa

to get back to normal life.

1:07

‘Well past the time’ for trucker convoy protest in Ottaw...

‘Well past the time’ for trucker convoy protest in Ottawa to end, Blair says

Singh has accused Trudeau of a lack of leadership, saying the prime minister “needs to be present” to deal with the protest, but had “not been visible” so far.

Singh called for an emergency debate in the House of Commons and blamed the Liberals for using the protest as “a wedge issue.”

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Trucker convoy: Here's what the 10-day injunction against horns includes

By [Amanda Connolly](#) • Global News

Posted February 8, 2022 12:38 pm ▼

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An Ottawa judge has granted an injunction to halt the persistent honking in downtown Ottawa. Litigation lawyer Fred Schumann breaks down the decision, and issues that could arise with enforcement.



-A

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78

For Ottawa residents living downtown, Tuesday may mark their first taste of relief in 12 days as a temporary court injunction takes effect that orders truckers in the so-called “[Freedom Convoy](#)” to stop blaring their horns.

Ontario Superior Court Justice Hugh McLean did not grant the 60-day injunction against horns that had been sought by Paul Champ, the lawyer for the plaintiff — a 21-year-old public servant named Zexi Li.

READ MORE: [Judge grants injunction against honking in downtown Ottawa](#)

But McLean did grant an injunction for 10 days, and it remains to be seen whether that will be extended if demonstrators remain in the city.

2:25

Complications arise as Ottawa police commit to ending...

Complications arise as Ottawa police commit to ending convoy's 'occupation'

Here is what we know about the terms of the injunction.

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What does this mean for horn-honking?

The wording of McLean's injunction states that anyone not working with a municipal fire department is prohibited from using "air horns or train horns" within the area covered by the injunction.

That applies to any streets in downtown Ottawa, defined in the injunction as "any streets north of Highway 417, otherwise known as the Queensway."

READ MORE: [Ottawa police, politicians seek swift end to trucker convoy](#)

A large part of the area has been hard-hit by the encampments set up by the trucker convoy over recent weeks. Police have launched more than 60 criminal investigations into alleged hateful, threatening or violent conduct against residents of the neighbourhoods that stretch from the highway north toward Parliament Hill, where residents have been forced to endure deafening honking for days.

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2:44

Protesters opposing COVID mandates block crucial Ca...

Protesters opposing COVID mandates block crucial Canada-U.S. trade route

McLean's order also directed the three main organizers of the convoy to share the injunction through their social media as well as any other channels "to all persons they know who are or who have been participating" in the convoy between Jan. 28 and now.

What extra powers does it grant to police?

Included in the injunction is the authority for police to crack down on those who violate it.

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Trudeau government actively considering emergency powers to end blockades: Blair

81 Four arrested as blockade of key B.C. border crossing stretches into second day: RCMP

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Specifically, the injunction grants police the power to “arrest and remove any person who has knowledge of this Order and who the Police have reasonable and probable grounds to believe is contravening or has contravened any provision of this Order.”

Police still have the discretion to decide how and when — or if — to do so.

READ MORE: [What options do police have amid ‘illegal,’ ‘unlawful’ conduct?](#)

The injunction states that the “timing and manner” of enforcing it is up to police, as is the authority to release anyone arrested for violating the injunction if that person signs a written promise to abide by it.

Ottawa’s deputy police chief, Steve Bell, confirmed during a press conference on Tuesday that officers “will exercise their discretion in enforcing this order.”

In a Tweet on Tuesday evening, Ottawa police said it will enforce the order until Feb. 16 or any other date set by the court.

“All officers have been prepped on the terms of the order,” the Tweet said.

“Anyone in violation of the terms may be subject to detention or arrest.”

Ottawa Police  @OttawaPolice · Feb 8, 2022 

ATTENTION DEMONSTRATORS: @OttawaPolice will enforce an order prohibiting anyone from using air horns or train horns for any street north of Hwy 417 until February 16th, 2022 or any other date set by the Court.

Ottawa Police 

@OttawaPolice

All officers have been prepped on the terms of the order. Anyone in violation of the terms may be subject to detention or arrest.

ottawapolice.ca/en/news-and-co... #Ottawa #Ottnews

6:40 PM · Feb 8, 2022 

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As well, the injunction also makes clear that ordering an end to the honking of horns is not an order for the convoy demonstrators to pack up and go home.

McLean states in it that so long as the terms of the injunction are respected, the organizers and anyone else taking part are free to continue so long as they engage in “a peaceful, lawful and safe protest.”

On Feb. 16, the court will meet again to hear whether the 10-day injunction should be extended.

What happens next?

Noise levels across much of the impacted areas appeared to be lower on Tuesday after weekend levels that saw local and federal officials saying that residents were hitting their “breaking point.”

Yasir Naqvi, Liberal MP for Ottawa Centre, described the noise as “torturous” for his constituents.

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Catherine McKenney, local councillor for one of the hardest-hit wards, thanked Champ and Li after news of the injunction came out, saying that they had done “more than any level of government after 10 days of illegal occupation.”

“Residents in the downtown are finally getting action to stop some of the terror they’ve been living under,” McKenney wrote on Twitter.

READ MORE: [Ottawa police call for more personnel to ‘regain control’ of the city](#)

It remains unclear, however, how long the convoy will remain encamped in the city.

Police have been stepping up what Chief Peter Sloly called a “surge and contain” strategy over the past several days, though on Monday he warned an additional 1,800 officers are needed.

Sloly has said Ottawa police were “overwhelmed” by the number of people taking part in the convoy, which quickly set up staging areas and infrastructure in several locations across the city.

Over the weekend, the police said anyone bringing jerry cans of fuel to the convoy would be charged.

The extent of that enforcement is not yet fully clear.

3:20

Ottawa police take action as politicians seek swift end ...

Ottawa police take action as politicians seek swift end to trucker convoy protests

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OTTAWA | News

Meet the 21-year-old Ottawa woman who stopped the horns



Michael Woods

CTV News Ottawa Digital Multi-Skilled Journalist

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Published Tuesday, February 8, 2022 10:33AM EST

Last Updated Tuesday, February 8, 2022 6:44PM EST

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In the end, it wasn't the might of the city bureaucracy or law enforcement who got the constant blaring of truck horns to stop after more than week of terrorizing downtown Ottawa residents.

It was a 21-year-old resident of Centretown who had simply had enough.

"This situation, quite frankly, really ruffled my feathers," Zexi Li, the lead plaintiff in a proposed class-action lawsuit told CTV Morning Live on Tuesday. "I really, really felt that no matter what, I had to do something."

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"If that something is to be a voice and be a face—and even be even a target—for people to understand what really is going on here, I was more than willing to do so."

An Ontario Superior Court judge granted a 10-day injunction on Monday ordering an end to the incessant honking by truckers parked on downtown streets. Anyone who violates the injunction could be found in contempt, which brings stiffer penalties than regular bylaw charges.

"It's a big win, but it's also a baby step," Li said. "We really did deserve some peace and we're glad to have some, at least for the next 10 days."

Li said she has found the noise of the convoy protesters "unbearable."

"I don't even have the worst of it," she said. "There are so many people that live in my neighbourhood that can't live here anymore, that have to have escape their own home, and that quite frankly is completely unacceptable."

Christine Johnson, a lawyer with Champ and Associates and co-counsel in the matter, told CTV's Power Play that Li has suffered online abuse because of the lawsuit.

"While we've had an outpouring of support from many in the community, across the country, both towards our law firm and our very brave client we represent, she's had also received a lot of vile hatred both directed at her," Johnson said.

"It takes a lot of courage, as you can imagine, for a young woman to stand up on behalf of her neighbours ... It's been stressful. It's been overwhelming and I think she felt as though it was the right thing to do."

Paul Champ

@PaulChampLaw



This video is so wonderful. I live in Centretown but just outside the worst of the "horn zone". When I walked those streets I couldn't imagine how anyone could live through the constant blaring. Felt terrible for my neighbours. Glad our team and Zexi Li could help our community.

Mackenzie Gray  @Gray_Mackenzie

It is dead on Wellington right now. Not a honk can be heard and

only a few people wandering around #cdnpoli #ottnews

1:41 AM · Feb 8, 2022



1.3K Reply Share this Tweet

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Li said she is also receiving a lot of messages of support from people who sympathetic to what Centretown residents are going through.

Asked how she thinks the trucker protest should be brought to an end, Li said she is surprised the situation has reached the point where her opinion on that is being sought.

"I think it's very interesting that my opinion is asked. Because while I do understand it, at the end of the day, I am a 21-year-old, I am just barely an adult. I can't believe that it's come to this point where people are asking me how I think it should end."

Li did say she agrees with the course Prime Minister Justin Trudeau has taken in not meeting with the convoy leaders.

"I fully agree that these people cannot be negotiated with," she said.

The proposed class-action lawsuit is seeking \$9.8 million in damages on behalf of Centretown residents. The next hearing, on whether the injunction will be extended, is set for Feb. 16.

"I can only hope that some kind of reparations will be seen for people in my community, and that at the very least people recognize the severity of what's going on here and what has happened to us," Li said.

"A lot of people have trauma because of this now, and it's trauma that I personally don't think should have ever happened to them."

Ottawa police say people using horns in violation of the court order may be arrested and charged for contravening it. Possible penalties include up to two years imprisonment.

RELATED IMAGES



Zexi Li is the lead plaintiff in a proposed class action lawsuit on behalf of Centretown residents who have endured relentless noise due to the truck protests. Li says it was all about helping her community. (Leah Larocque/CTV News Ottawa)

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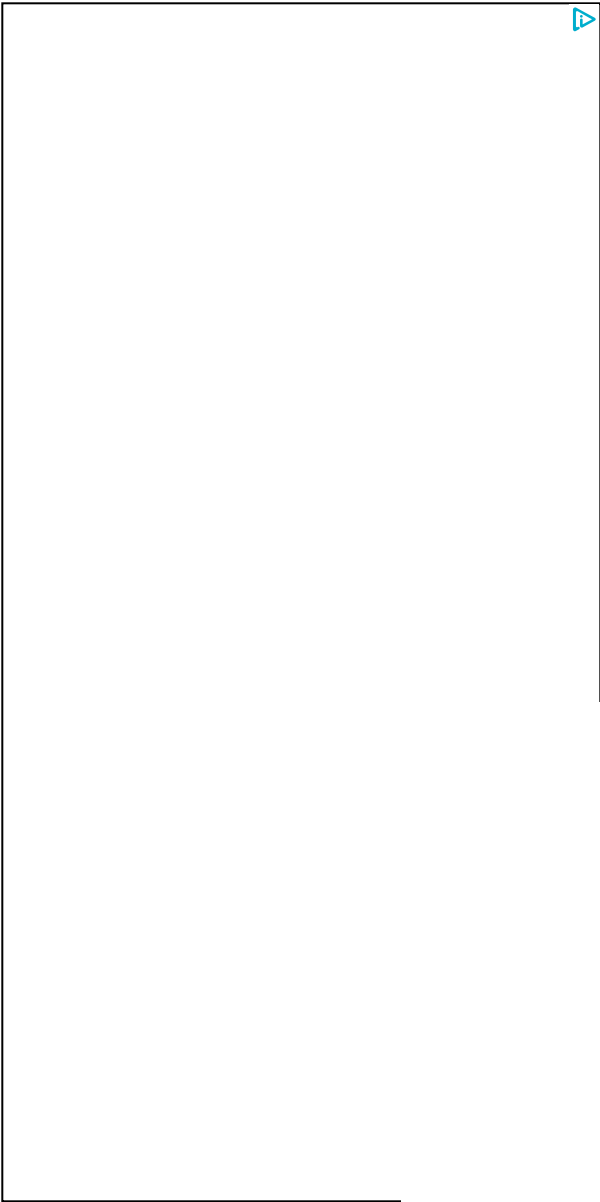
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Judge grants interim injunction against honking at Ottawa protest



Postmedia News
Blair Crawford

Feb 08, 2022 • 5 days ago • 4 minute read • [Join the conversation](#)



People wave flags on top of a truck in front of Parliament Hill as truckers and their supporters continue to protest against the COVID-19 vaccine mandates in Ottawa, Ontario, Canada, February 6, 2022. PHOTO BY PATRICK DOYLE /REUTERS

The judge says, “Silence!”

STORY CONTINUES BELOW

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Ontario Superior Court Justice Hugh McLean granted a temporary 10-day injunction Monday, banning the horn honking and air horn blowing that has echoed through downtown Ottawa since demonstrators arrived in the city on Jan. 28. The ongoing noisy protest has interfered with “citizens’ right to quiet,” he said.

“People have a right to protest various things in various ways,” McLean said. But he agreed with lawyer Paul Champ that the incessant noise could cause long-term and irreparable hearing damage.

“Tooting a horn is not an expression of any great thought,” McLean noted wryly, even allowing for the “potential artistic merit” of the truckers’ creative use of patterns and beats.

The injunction takes effect immediately. McLean also rejected the demonstrators’ request to blow their horns for five minutes once a day at 5 p.m.

STORY CONTINUES BELOW



“The only purpose of this (horn blowing) is to bring attention to this protest,” McLean said. “There’s no need for that anymore. The public is fully aware of what’s going on.”

The plaintiff in the case is 21-year-old downtown resident, Zexi Li. In his evidence, Champ said Li has measured the noise in her apartment at more than 80 decibels, which he likened to “having a lawn mower running in her living room, 24 hours a day, seven days a week.” Others have registered noise at street level in excess of 120 decibels when so called “train horns” are sounded.

While Li is the only one named in the case, the \$9.8-million class action is open to as many as 6,000 downtown residents who live in or close to the demonstration's "red zone."

STORY CONTINUES BELOW

"So happy!" Li texted this newspaper immediately after the judge's decision. "Excited for 10 (hopeful) days of peace!!!"



Zexi Li, who has launched a class-action lawsuit against the Ottawa trucker convoy due the noise etc., is pictured on Monday, Feb. 7, 2022. ERROL MCGIHON/Postmedia

Li agreed to stand as plaintiff out of frustration with the hands-off tactics adopted by the city and police during the first week of the demonstration.

“I live by the words, ‘I can make it through anything,’ ” Li said, before Monday’s hearing got underway. “But I know a lot of people aren’t able to and my heart just hurts the most for them.

“I’m not seeking confrontation, but I am seeking justice for the people they’re harming every single day they’re here. It’s confrontation out of necessity.”

Since her name became public, Li has been targeted and harassed, Champ told the hearing, which took place virtually over Zoom.

STORY CONTINUES BELOW

“My client is unbelievably brave,” he said. “My client has been subject to threats, to vile abuse online. Her phone number has been put online and people have been calling her.”

Li was asked by this newspaper if she had any regrets about taking part.

“Absolutely not. I am sick and tired of shedding tears for my neighbours. I’m sick and tired of hearing about how much fear there is in the streets,” she said.

“I’m utterly disappointed by the city’s reaction to what is going on. It took 10 days for any action to be taken. It took 10 days for our pleas to be heard. I can only hope that there will be more management of the situation from here on out,” she said.

“There is a peaceful way to protest. This is not it. The way they’re going about it delegitimizes their cause and, in fact, causes more irreparable harm to the people they say

they're trying to fight for. They really do need to recognize the damage their doing by being here and participating in it.”

STORY CONTINUES BELOW

The statement names as defendants the convoy's organizers: Chris Barber of Swift Current, Sask., Benjamin Dichter of Toronto, Tamara Lich of Medicine Hat, Alta., and Patrick King of Red Deer, Alta. It also names 60 “John Does” — drivers of semi-trucks in the protest who may later be identified as having taken part in the noise-making.

Lawyer Keith Wilson of the Calgary-based Justice Centre for Constitutional Freedom, who represented three of the four named defendants, said the protest was a matter of free expression. Two of his three clients don't have trucks and the third has not used his horn, he said.

"This is a spontaneous grassroots phenomena that started in Canada and is now spreading around the world in response to what we've all had to endure for the last two years. It's an effort to end that harm and that hardship," Wilson said.

STORY CONTINUES BELOW

He provided court with affidavits in support of the truckers.

"There is more evidence before you that downtown Ottawa residents don't feel they're being harmed and this is part of the democratic process," Wilson told the judge.

Founded in 2010, Justice Centre for Constitutional Freedoms has taken on a wide range of conservative and right-wing causes. It's representing the parents of an Ottawa school girl in a Human Rights Tribunal of Ontario hearing over gender identity teaching by the Ottawa-Carleton District School Board. In another, it's suing the Nova Scotia Registrar of Vehicles after it denied a pensioner, Lorne Grabher, his "GRABHER" vanity plate, saying it was "socially unacceptable." In 2017, the centre unsuccessfully fought a decision by the Ottawa Public Library to cancel a screening of the anti-immigration film, Killing Europe.

At the start of Monday's hearing, McLean addressed the issue of a racist slur that was posted in the Zoom chat section during Saturday's first hearing. McLean did not see the slur, but urged the lawyers who did to complain to the Crown attorney's office so that it can be investigated for potential contempt of court charges.

The matter will be back in court on Feb. 16 when the temporary 10-day injunction expires.



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- 3 Early closure of two downtown grocery stores prompted by unruly protesters**

TRUCKER PROTEST, DAY 17: Windsor's Ambassador bridge cleared; counter-protest blocks traffic

4 at Bank & Riverside; Convoy organizers plan to 'consolidate' efforts around Parliament Hill

5 YOU SAID IT: Others are watching

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Politics

Court grants injunction to silence honking in downtown Ottawa for 10 days

Judge said taking protesters' horns away does not rob them of their right to protest

[Catharine Tunney](#) · CBC News · Posted: Feb 07, 2022 2:44 PM ET | Last Updated: February 7



A person leaves a counter-protest as a protest against COVID-19 restrictions, marked by the constant honking of truck horns, continues into its second week in Ottawa on Saturday, Feb. 5, 2022. (Justin Tang/The Canadian Press)

An Ottawa judge has granted an interim injunction seeking to silence the honking horns that have plagued residents of downtown Ottawa for the past 11 days.

"Tooting a horn is not an expression of any great thought I'm aware of," said Justice Hugh McLean during a court hearing in Ottawa Monday.

The temporary injunction order is effective immediately and is meant to silence the horns at all hours for the next 10 days. It covers the zone north of the Queensway, the city's main east-west artery.

Lawyer Paul Champ said air horns and train horns are blasted at sound levels of 105 to 120 decibels for prolonged periods and can cause permanent hearing damage.

"Every hour this goes by, there is harm to the people of Centretown," he told the hearing.

- [**'It has to stop': Trudeau accuses protesters of blockading democracy during Commons debate**](#)
- [**Ottawa declares state of emergency as police boost enforcement, target protest's fuel supply**](#)

Keith Wilson, a lawyer representing three protest organizers named in the suit, argued that his clients — Tamara Lich, Benjamin Dichter and Chris Barber — are not personally responsible for the noise.

He also said that what Ottawa is experiencing is a grassroots protest against pandemic measures.

"There is more evidence before you that downtown Ottawa residents don't feel they're being harmed and this is part of the democratic process," he said.



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A cyclist rides toward a police barricade where trucks are lined up near Parliament Hill on Wednesday, Feb. 2, 2022 in Ottawa. (Adrian Wyld/The Canadian Press)

The judge said that while the participants have a right to protest, taking their horns away would not rob them of that right.

The request for an injunction came out of a proposed class-action lawsuit filed with the Ontario Superior Court of Justice on Friday by lawyer Champ on behalf of his client Zexi Li, a 21-year-old public servant.

WATCH / Injunction granted to silence honking in downtown Ottawa:

Ottawa police ask for reinforcement as courts silence horns



Ottawa police ask for reinforcement as courts silence horns

6 days ago | 2:40

Ottawa police are asking for more reinforcements to fight protests that city officials have started calling an 'insurrection.' Meanwhile, a court injunction silenced the honking horns to the relief of area residents. 2:40

It sought an injunction prohibiting the defendants, or any other participant in the anti-vaccine mandate convoy protest, from using vehicle horns in the vicinity of downtown.

According to the order, police are now authorized to arrest and remove anyone they believe is aware of the order and is contravening it. They also have the discretion to release anyone from arrest if that person agrees in writing to obey the order.

The defendants are also ordered to publicize the injunction on social media.

The court is adjourned until Feb. 16, at which point all sides will discuss continuing the order.

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Judge orders truckers' horns silenced for 10 days

Blair Crawford
Feb 08, 2022 • 5 days ago • 5 minute read



A man covers his ears while passing honking trucks parked on Wellington Street this week. PHOTO BY TONY CALDWELL /Postmedia

The judge says, “Silence!”

STORY CONTINUES BELOW

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STORY CONTINUES BELOW

Zexi Li's lawyer said she has measured the noise in her apartment at more than 80 decibels. PHOTO BY ERROL MCGIHON /Postmedia

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STORY CONTINUES BELOW

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section 101 of the *Courts of Justice Act*, Rule 40.01 of the *Rules of Civil Procedure*, and section 12 of the *Class Proceedings Act*.

2. **THIS COURT ORDERS** that any persons having notice of this Order are hereby restrained and enjoined from using air horns or train horns, other than those on a motor vehicle of a municipal fire department, in the geographic location anywhere in the City of Ottawa, in the vicinity of downtown Ottawa, being any streets north of Highway 417, otherwise known as the Queensway, for 10 days from the date of this Order.
3. **THIS COURT ORDERS** that the Defendants Barber, Dichter and Lich forthwith direct that they communicate this Order through their social media and other channels to all persons they know who are or who have been participating in the Freedom Convoy Protest in Ottawa, Ontario, from January 28, 2022, to the present day;
4. **THIS COURT ORDERS** that any police officer with the Ottawa Police Service, and/or the appropriate police authority in the jurisdiction in question (the "Police"), shall have authorization to arrest and remove any person who has knowledge of this Order and who the Police have reasonable and probable grounds to believe is contravening or has contravened any provision of this Order.
5. **THIS COURT ORDERS** that the Police shall retain discretion:
 - a. as to the timing and manner of enforcement of this Order, and specifically retain discretion as to the timing and manner of arrest and removal of any person pursuant to this Order; and
 - b. to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has contravened, any provisions of this Order, upon that person agreeing in writing to abide by this Order.
6. **THIS COURT ORDERS** that any peace officer and any member of the Police who arrests or arrests and removes any person pursuant to this Order shall have authorization to release that person from arrest upon that person agreeing in writing to obey this Order;
7. **THIS COURT ORDERS** that, provided the terms of this Order are complied with, the Defendants and other persons remain at liberty to engage in a peaceful, lawful and safe protest.
8. **NOTICE OF THIS ORDER** may be given by: posting copies of this Order in or around downtown Ottawa; reading the Order to any person, including but not limited to reading the Order over an amplification system publishing this Order

online, including on social media accounts associated with the Defendants, and by distributing copies of this Order to media including CBC, Radio-Canada, CTV, Global News and all daily newspapers in the Ottawa-Gatineau area.

9. **THIS ORDER** shall not apply to persons acting in the course of or in the exercise of a statutory duty, power or authority.
10. **THIS COURT ORDERS** that the costs of this motion shall be in the cause.
11. **THIS COURT ORDERS** that the parties shall appear before the Court in Ottawa by videoconference on February 16, 2022 at 10:00am for the hearing of a motion to continue this Order.

A handwritten signature in black ink, appearing to read 'M. Lee', is written over a horizontal line.

Li was asked by this newspaper if she had any regrets about taking part.

“Absolutely not. I am sick and tired of shedding tears for my neighbours. I’m sick and tired of hearing about how much fear there is in the streets,” she said.

“I’m utterly disappointed by the city’s reaction to what is going on. It took 10 days for any action to be taken. It took 10 days for our pleas to be heard. I can only hope that there will be more management of the situation from here on out,” she said.

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STORY CONTINUES BELOW

Canada: Overhead sight at the freedom convoy 2n...



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STORY CONTINUES BELOW

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- [Protesters say they will stay put despite increased police enforcement](#)
- ['Freedom Convoy' raises millions on Christian site after GoFundMe freezes donations](#)
- [Egan: With fresh reinforcements, finally some pushback from police](#)
- [Truck convoy: State of emergency declared; police announce arrests; people bringing 'material' supports to protesters — including gas — could be subject to arrest, police say](#)
- [Mayor declares emergency after weekend of chaos; police begin choking off fuel supply to protesting truckers](#)
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- 3 Truck carrying 2,000 firearms allegedly stolen in Peterborough, Ont., police say**
- 4 Counter-protesters blockade Freedom Convoy on Riverside Drive**
- 5 Unruly protesters prompt early closure of two downtown grocery stores**

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This is **Exhibit “B”** referred to
in the Affidavit of **TRUDY MOORE**,
affirmed before me in the City of Ottawa,
in the Province of Ontario,
this 15th day of February, 2022.

A handwritten signature in black ink, appearing to be 'J. G.', written over a horizontal line.

A Commissioner for Taking Oaths, etc.



7 février 2022 14h53 / Mis à jour à 17h49

Camionneurs: interdiction de klaxonner pendant 10 jours à Ottawa



CHARLES-ANTOINE GAGNON
Le Droit

Un juge de la Cour supérieure de l'Ontario a émis lundi après-midi une injonction pour interdire l'usage des klaxons pendant 10 jours par les

camionneurs qui manifestent à Ottawa¹⁴⁵ pour la levée des restrictions et obligations sanitaires liées à la COVID-19.

La mesure est immédiate et durera jusqu'au 17 février. Le tribunal tiendra une audience le 16 février pour faire le point.

La décision du juge Hugh McLean a suivi une audience où l'avocat de la plaignante Zexi Li, qui habite dans le centre-ville, a notamment indiqué que le bruit incessant est nuisible et dommageable pour l'ouïe de la femme.

La demande d'injonction s'inscrit dans une demande de recours collectif de 9,8 millions de dollars contre quatre des organisateurs de la manifestation, soit Chris Barber, Benjamin Dichter, Tamara Lich, Patrick King et soixante John Doe, soit des camionneurs non identifiés.

Le mouvement de protestation en était lundi à sa onzième journée dans la capitale canadienne. En rendant sa décision, le juge a convenu que les arguments de la partie demanderesse voulant que les coups de klaxon des mastodontes soient nuisibles sont valides, et que les niveaux de décibels peuvent causer des torts irréparables à l'ouïe.

Le juge a tenu à préciser que les gens ont le droit de manifester contre plusieurs dossiers de différentes façons.



les camionneurs ont proposé lundi matin de ne faire retentir les klaxons que pendant cinq minutes par jour et ce, à 17h. Cette proposition a été refusée par le juge McLean.

— LE DROIT, ETIENNE RANGER

«Cela est enchâssé dans le Common Law et dans la Charte (des droits et libertés), a mentionné le magistrat en rendant sa décision. Toutefois, dans les circonstances qui nous retiennent ici, nous avons la manière de s'exprimer, qui est l'usage continu du klaxon par des véhicules, des camions en particulier, qui a un effet (nocif) sur les citoyens qui habitent dans le secteur de la manifestation».

L'avocat de trois des parties ciblées par le recours collectif, M^e Ken Wilson, a indiqué devant le juge qu'après avoir accepté de n'utiliser les klaxons qu'entre 20h et 8h, les camionneurs ont proposé lundi matin de ne les faire retentir que pendant cinq minutes par jour et ce, à 17h. Le juge McLean a refusé la proposition.

«L'inférence que j'en fais est que les preuves venant des défendeurs potentiels comprend le fait qu'il y a une nature dommageable à l'usage de ces klaxons», a observé le juge McLean à la suite de la proposition des camionneurs.

«La seule raison pour les klaxons est d'attirer l'attention à la manifestation. Selon moi, il n'y a plus besoin de faire ça. Le public comprend entièrement ce qui se

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passe au centre-ville d'Ottawa», a continué le juge.

M^e Wilson a tenu à mentionner au juge que la manifestation «a été pacifique, que les résidents n'ont pas été restreints dans leur capacité à se déplacer et que la situation, et nous le reconnaissons, est le bruit causé par les coups de klaxon».

La demande pour recours collectif signée par M^e Paul Champ, l'avocat de la plaignante, mentionne que les coups de klaxon des camions, dont un est celui d'un train, émettent des sons variant entre 100 et 150 décibels.

«Ces klaxons ne sont pas censés être utilisés plus que quelques secondes en raison de la dangerosité des niveaux de son et parce que cela peut causer des dommages permanents à l'oreille humaine», est-il notamment spécifié, tout en précisant qu'ils ont été utilisés de manière continue de 12 à 16 heures par jour.

Le document mentionne aussi que le son dans les résidences près des camions est d'environ 80 décibels alors que le son normal dans un domicile se situe entre 35 et 40 décibels. Une tondeuse à gazon peut générer de 88 à 94 décibels, souligne le document de cour.

Merci de vous abonner pour accéder en tout temps à la totalité de nos contenus. En vous abonnant, vous soutenez concrètement un **journalisme local de qualité**, fiable, au service de nos régions.

JE M'ABONNE



ICI Ottawa-Gatineau

Un juge accorde une injonction de 10 jours contre les klaxons des camionneurs



Le chef de la police d'Ottawa a lancé lundi un appel pressant aux autorités fédérale, provinciale et municipale.

PHOTO : LA PRESSE CANADIENNE / JUSTIN TANG

Radio-Canada

le 7 février 2022

Un juge de la Cour supérieure de l'Ontario a tranché lundi en faveur des résidents du centre-ville qui demandaient cette injonction qui a pour but d'empêcher les camionneurs de klaxonner sans relâche dans le centre-ville d'Ottawa. L'injonction est d'une durée de 10 jours.

Le juge Hugh McLean a précisé que cette injonction est temporaire puisqu'il a besoin d'entendre davantage de preuves. Cependant, il a mentionné en avoir suffisamment entendu pour rendre sa décision lundi.

La demande a été faite par des résidents d'Ottawa qui cherchaient à obtenir une injonction interdisant la poursuite des bruits de sirènes et des klaxons répétitifs depuis maintenant 11 jours.

Pour Emilie Taman, l'avocate au cabinet qui représente ces résidents, il s'agit d'une victoire pour leur cliente, Zexi Li, cette fonctionnaire de 21 ans qui a entrepris le recours collectif. Dans son appartement, le son des klaxons enregistrait 85 décibels, ce qui équivaut au niveau sonore d'une tondeuse.

« On est particulièrement ravi, surtout pour notre cliente. Elle est extrêmement courageuse. Elle s'est mise à l'avant pour toute sa communauté. Elle est vraiment très très heureuse », a commenté Emilie Taman.

Tous les corps policiers qui ont pouvoir à Ottawa pourront faire respecter cette injonction. Les conséquences iront des amendes à des peines d'emprisonnement.

Il est possible que cette interdiction soit prolongée si des résidents en font la demande.

À lire aussi :

- La Ville d'Ottawa réclame 1800 personnes en renfort immédiatement pour sortir de la crise
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- Une opération policière au site Coventry donne lieu à 2 arrestations à Ottawa
- Manifestation à Ottawa : le maire Watson déclare l'état d'urgence

L'avocat Paul Champ a mentionné la semaine dernière que ces bruits nuisaient considérablement à l'utilisation et à la jouissance privée des maisons et que ce comportement était complètement déraisonnable et injustifié.

Les citoyens demandent 100 \$, par jour, pour chaque personne qui a souffert des bruits causés par les camionneurs et par les autres manifestants. Ils ont également fait savoir que des personnes ont subi des blessures, des dommages, de la détresse mentale, de la détresse émotionnelle, de la difficulté à dormir, des difficultés de concentration et des maux de tête.

La requête contient des allégations qui n'ont pas été prouvées devant les tribunaux.

L'avocat qui représente les trois personnes nommées dans l'action collective proposée, Keith Wilson, a répliqué qu'un seul de ses trois clients est propriétaire d'un camion, et qu'il n'a pas utilisé son klaxon, selon lui.

150

L'avocat Keith Wilson a aussi ajouté que les camionneurs et leurs sympathisants ont convenu de ne pas les faire retentir entre 20 h et 8 h.

La demande de dédommagement de 9,8 millions \$ n'a pas fait partie des audiences aujourd'hui.

Avec les informations de Nafi Alibert, de Catherine Morasse et de La Presse canadienne

This is **Exhibit “C”** referred to
in the Affidavit of **TRUDY MOORE**,
affirmed before me in the City of Ottawa,
in the Province of Ontario,
this 15th day of February, 2022.

A handwritten signature in black ink, appearing to be 'J. G.', written over a horizontal line.

A Commissioner for Taking Oaths, etc.



OTTAWA POLICE SERVICE
SERVICE DE POLICE D'OTTAWA
A Trusted Partner in Community Safety
Un partenaire fiable de la sécurité communautaire

Feedback

Enforcement of Court Order in Downtown Core

Posted On Tuesday February 08, 2022

Like 68

Tweet



Subscribe

FOR IMMEDIATE RELEASE: Tuesday, February 8, 2022 6:34pm

(Ottawa) – On February 7, 2022, Justice McLean of the Ontario Superior Court of Justice granted a temporary injunction restraining any person, who has notice of the court order, from using air horns or train horns, other than those on a motor vehicle of a municipal fire department.

This order applies to the downtown core in the City of Ottawa which is defined as any streets north of Highway 417 (Queensway). The injunction has been granted for a period of 10 days (i.e. until end of day February 17, 2022) and will be enforced by the Ottawa Police Service and its partners effective immediately.

If a person, with reasonable notice is believed to be

1. using air horns or train horns, other than those on a motor vehicle of a municipal fire department; and
2. is in the vicinity of downtown Ottawa: this geographical location includes the city's downtown, and specifically, any streets north of Highway 417 (Queensway), for a period of 10 days.

Then they may be arrested for contravening the Court Order or they may be arrested and/or charged under Section 127 of the *Criminal Code*.

If a person is arrested for contravening the Court Order and the person indicates, in writing, that they will obey and abide by the Court Order, they may be released.

If a person is arrested for contravening the Court Order and they refuse to indicate in writing that they will obey and abide by the Court Order, they may be taken to the Superior Court for civil contempt proceedings and criminal contempt prosecutions.

Penalties include up to two years imprisonment and/or another form of punishment as deemed appropriate at time of conviction.

- 30 -

CONTACT:

Media Relations Section

Tel: 613-236-1222, ext. 5366

[Back to Search](#)

Contact Us

Ottawa Police Service

P.O. Box 9634 Station T, Ottawa, Ontario, K1G 6H5

T: [613-236-1222](tel:613-236-1222), TTY: [613-232-1123](tel:613-232-1123)

[Email Us](#)

© 2022 Ottawa Police Service



Ottawa Police Service P.O. Box 9634 Station T, Ottawa, Ontario, K1G 6H5, T: [613-236-1222](tel:613-236-1222), TTY service for the deaf, deafened and hard of hearing: [613-232-1123](tel:613-232-1123)

Design by eSolutionsGroup (<http://www.esolutionsgroup.ca>)

Offence-related property, including vehicles, may be seized as part of the offence. The vehicles may be detained and, following a conviction, possibly forfeited.

Charges or convictions related to the unlawful activity associated with the demonstration may lead to denial in crossing the USA border.

Child and youth safety at Ottawa demonstrations (February 9, 2022)

(Ottawa) – The Ottawa Police Service (OPS), in collaboration with The Children’s Aid Society of Ottawa (CASO), will work to ensure the safety and wellbeing of children and youth at the current demonstration in the downtown core.

Ottawa police officers are aware of concerns about child and youth attendance at the demonstration.

Police have a role to play in observing any potential dangers and will report them immediately to CASO. In matters that involve a child or youth who is in the protest area, CASO will work closely with the OPS to respond to the concern. Child and youth wellbeing and safety is top of mind for CASO.

CASO continues to play its role in ensuring the safety and wellbeing of children and youth in the community. The Society has a duty to investigate whenever there are allegations of abuse or neglect that suggest a child or youth may be in need of protection.

There have been ongoing reports to CASO regarding child welfare concerns amid the Ottawa protest. CASO considers all information received from the public to determine the best response.

If there are concerns about the safety or maltreatment of a child or youth in Ottawa, please call CASO at 613-747-7800, or email yourcasquestion@casott.on.ca.

COURT ORDER

Enforcement of Court Order in Downtown Core (February 8, 2022)

On February 7, 2022, Justice McLean of the Ontario Superior Court of Justice granted an temporary injunction restraining any person, who has notice of the

court order, from using air horns or train horns, other than those on a motor vehicle of a municipal fire department. This order applies to the downtown core in the City of Ottawa which is defined as any streets north of Highway 417 (Queensway). The injunction has been granted for a period of 10 days (i.e. until end of day February 17, 2022) and will be enforced by the Ottawa Police Service and its partners effective immediately.

If a person, with reasonable notice is believed to be

- i. using air horns or train horns, other than those on a motor vehicle of a municipal fire department; and
- ii. is in the vicinity of downtown Ottawa: this geographical location includes the city's downtown, and specifically, any streets north of Highway 417 (Queensway), for a period of 10 days.

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Ottawa Police Service Make 23 Arrests in Relation to Demonstration – 1,300 Tickets Issued (February 8, 2022)

(Ottawa) – The Ottawa Police Service and its partners are continuing to work to put an end to the unlawful demonstrations in the downtown core, respond to calls for service, and improve neighbourhood safety.

We continue to advise demonstrators not to enter Ottawa, and to go home.

As of 12:00 PM EST, the Ottawa Police Service can report:

Enforcement and Charges Laid

- Police have responded to over 850 calls for service in relation to the demonstrations since they began.
- Police continue to prevent people from supplying fuel and other material supports to demonstrators.

Court File No: CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

THE HONOURABLE MR JUSTICE MCLEAN) MONDAY, THE 7th DAY
)
) OF FEBRUARY, 2022

BETWEEN:

ZEXI LI

Plaintiff/Moving Party

- and -

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10,
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JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants/Responding Parties

ORDER

THIS MOTION, made by the Plaintiff for an interlocutory injunction and costs, pursuant to section 101 of the *Courts of Justice Act* and Rule 40.01 of the *Rules of Civil Procedure*, was heard at Ottawa on February 5 and 7, 2022 by videoconference.

UPON READING the motion records of the parties and **UPON HEARING** the oral arguments made by counsel for the parties by Zoom,

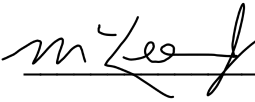
1. **THIS COURT ORDERS** that an interlocutory injunction is granted, pursuant to

section 101 of the *Courts of Justice Act*, Rule 40.01 of the *Rules of Civil Procedure*, and section 12 of the *Class Proceedings Act*.

2. **THIS COURT ORDERS** that any persons having notice of this Order are hereby restrained and enjoined from using air horns or train horns, other than those on a motor vehicle of a municipal fire department, in the geographic location anywhere in the City of Ottawa, in the vicinity of downtown Ottawa, being any streets north of Highway 417, otherwise known as the Queensway, for 10 days from the date of this Order.
3. THIS COURT ORDERS that the Defendants Barber, Dichter and Lich forthwith direct that they communicate this Order through their social media and other channels to all persons they know who are or who have been participating in the Freedom Convoy Protest in Ottawa, Ontario, from January 28, 2022, to the present day;
4. **THIS COURT ORDERS** that any police officer with the Ottawa Police Service, and/or the appropriate police authority in the jurisdiction in question (the "Police"), shall have authorization to arrest and remove any person who has knowledge of this Order and who the Police have reasonable and probable grounds to believe is contravening or has contravened any provision of this Order.
5. **THIS COURT ORDERS** that the Police shall retain discretion:
 - a. as to the timing and manner of enforcement of this Order, and specifically retain discretion as to the timing and manner of arrest and removal of any person pursuant to this Order; and
 - b. to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has contravened, any provisions of this Order, upon that person agreeing in writing to abide by this Order.
6. **THIS COURT ORDERS** that any peace officer and any member of the Police who arrests or arrests and removes any person pursuant to this Order shall have authorization to release that person from arrest upon that person agreeing in writing to obey this Order;
7. **THIS COURT ORDERS** that, provided the terms of this Order are complied with, the Defendants and other persons remain at liberty to engage in a peaceful, lawful and safe protest.
8. **NOTICE OF THIS ORDER** may be given by: posting copies of this Order in or around downtown Ottawa; reading the Order to any person, including but not limited to reading the Order over an amplification system publishing this Order

online, including on social media accounts associated with the Defendants, and by distributing copies of this Order to media including CBC, Radio-Canada, CTV, Global News and all daily newspapers in the Ottawa-Gatineau area.

9. **THIS ORDER** shall not apply to persons acting in the course of or in the exercise of a statutory duty, power or authority.
10. **THIS COURT ORDERS** that the costs of this motion shall be in the cause.
11. **THIS COURT ORDERS** that the parties shall appear before the Court in Ottawa by videoconference on February 16, 2022 at 10:00am for the hearing of a motion to continue this Order.



This is **Exhibit “D”** referred to
in the Affidavit of **TRUDY MOORE**,
affirmed before me in the City of Ottawa,
in the Province of Ontario,
this 15th day of February, 2022.

A handwritten signature in black ink, appearing to be 'J. G.', written over a horizontal line.

A Commissioner for Taking Oaths, etc.

From: Champ Law - Convoy Class Action <convoyclassaction@champlaw.ca>
Sent: Thursday, February 10, 2022 10:46 AM
To: patrickking@canada-unity.com
Cc: Champ Law - Convoy Class Action
Subject: Notice of Injunction and Claim
Attachments: CV-22-00088514-00CP - Order 02-07-2022 - Zexi Li v. Chris Barber et al. - Issued.pdf; Li v Barber et al (issued).pdf

Hello Mr King,

You are hereby given formal notice of the Order of Justice McLean dated February 7, 2022.

A copy of the Order is attached hereto, together with the Statement of Claim in the action in which you are a named defendant, Li v Barber et al, court file number CV-22-00088514-00CP.

If you would like further information regarding this matter, you may contact our firm at this email address.

Thank you,

CHAMP & ASSOCIATES | CHAMP & AVOCATS
43 Florence Street | 43, rue Florence
Ottawa, ON K2P 0W6
T: 613-237-4740
F: 613-232-2680
www.champlaw.ca

This email is subject to legal privilege. If this message was not intended for you, please immediately delete and notify the sender. Thank you.



Court File No: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

THE HONOURABLE MR JUSTICE MCLEAN) MONDAY, THE 7th DAY
)
) OF FEBRUARY, 2022

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10,
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JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants/Responding Parties

ORDER

THIS MOTION, made by the Plaintiff for an interlocutory injunction and costs, pursuant to section 101 of the *Courts of Justice Act* and Rule 40.01 of the *Rules of Civil Procedure*, was heard at Ottawa on February 5 and 7, 2022 by videoconference.

UPON READING the motion records of the parties and **UPON HEARING** the oral arguments made by counsel for the parties by Zoom,

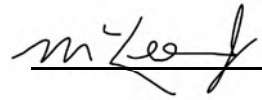
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5. **THIS COURT ORDERS** that the Police shall retain discretion:
 - a. as to the timing and manner of enforcement of this Order, and specifically retain discretion as to the timing and manner of arrest and removal of any person pursuant to this Order; and
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Date of Issuance: 02/07/2022



Court File No:

Electronically issued
Délivré par voie électronique : 04-Feb-2022
Ottawa

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ZEXI LI

Plaintiff

- and -

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10,
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JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55,
JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants

Proceeding under the Class Proceedings Act, 1992

STATEMENT OF CLAIM

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office,

WITHIN TWENTY DAYS after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM, and \$10,000 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and \$400 for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date: _____

Issued by: _____

Registrar
Court House,
161 Elgin Street
Ottawa, Ontario

TO: Chris Barber
Swift Current, Saskatchewan

AND TO: Benjamin Dichter
Toronto, Ontario

AND TO: Tamara Lich
Medicine Hat, Alberta

AND TO: Patrick King
Red Deer, Alberta

AND TO: John Doe 1 to John Doe 60

CLAIM

1. The Plaintiff, on behalf of the Class described herein, claims the following:
 - (a) an order certifying this action as a class proceeding and appointing the Plaintiff as the representative Plaintiff for the Class (as defined below);
 - (b) damages for private nuisance in the amount of \$4.8-million or any such amount that this Honourable Court deems appropriate;
 - (c) punitive damages in the amount of \$5-million;
 - (d) injunctive relief prohibiting the continuation of the nuisance;
 - (e) pre-judgment and post-judgment interest in accordance with the *Courts of Justice Act*, as amended;
 - (f) the costs of this action, including HST;
 - (g) the costs of notice and of administering the plan of distribution of the recovery in this action, plus applicable taxes, pursuant to section 26 of the *Class Proceedings Act*, 1992, S O 1992, c. 6; and
 - (h) such further and other relief as this Honourable Court may deem just.

OVERVIEW

2. Over the past two years, the COVID-19 pandemic has caused significant stress, severe illness, death and grief to every person in Canada. Over 33,000 Canadians have died from COVID-19 and thousands more suffer from its prolonged effects.
3. Governments at all levels across the country have adopted public health measures to prevent severe illness and death from COVID-19. These public health

measures have caused significant disruption to the lives of every Canadian. Despite this disruption, the vast majority of Canadians support public health measures, including vaccine mandates, because they believe these measures save lives.

4. A minority of Canadians are strongly opposed to these public health measures. The Defendants are among this minority. To express their political opposition to COVID-19 public health measures, the Defendants organized a “Freedom Convoy” of vehicles, including a large number of semi-trailer-tractor trucks, to travel from different parts of Canada and converge on the national capital of Ottawa.

5. The Defendants planned to organize a large demonstration in the vicinity of the Parliament Buildings in Ottawa. Like many protesters, they wanted their voices heard by political leaders. To ensure that happened, the Defendants designed a plan to block all the streets and roadways around Parliament and the surrounding neighbourhood, and make as much noise as possible and cause discomfort to the political leaders. To make that noise, the Defendants planned, organized, encouraged and directed “Freedom Convoy” participants to blast the horns on their vehicles, non-stop, for several hours.

6. As planned by the Defendants, the Freedom Convoy vehicles began to arrive in Ottawa in Ottawa on Friday, January 28, 2022. As planned by the Defendants, the Freedom Convoy protests formally launched on Saturday, January 29, 2022. Unlike most protests, the Freedom Convoy decided to stay and keep protesting, every day and night, until the Government of Canada met their demands of dropping all public health measures across Canada. The fact that public health measures are predominantly implemented by provincial governments has not deterred the Defendants. At the time this claim is issued, the protest remains ongoing.

7. A key tactic of the Freedom Convoy is blasting vehicle horns non-stop, all day. These horns include the air horns and train horns on the many semi-trucks. Air horns and train horns create an extremely loud noise as a warning. Air horns and train horns emit noise in the range of 100 to 150 decibels. These horns are not meant to be used

for longer than a few seconds because the sound levels are dangerous and cause permanent damage to the human ear. Despite these dangers, the Freedom Convoy trucks have been blasting these dangerous horns continuously for 12 to 16 hours per day.

8. The historical neighbourhood around the Parliament Buildings is home to approximately 24,000 residents. These residents are used to the inconvenience of large demonstrations and protests. Sometimes they even join in if they believe in the cause. These residents understand and respect the importance of democratic freedoms, including the freedoms of association, assembly and expression. But they have never experienced anything like the constant and excruciatingly loud horns of the Defendants' Freedom Convoy. For the approximately 6,000 residents who live closest to the protests, the non-stop blaring horns have caused unbearable torment in the sanctity of their own homes.

9. The Freedom Convoy horn protest organized by the Defendants has caused significant mental distress, suffering and torment to the Plaintiff and the proposed Class Members who live in the six-block radius around the main protest streets. The horn protest has substantially and unreasonably interfered with the private use and enjoyment of the Class Members' property.

PARTIES

10. The Plaintiff Zexi Li resides in Ottawa, Ontario, within five blocks of Parliament Hill. She is a 21-year-old public servant and graduate of the University of Ottawa.

11. The Defendant Chris Barber resides in Swift Current, Saskatchewan. He is one of the organizers of the Freedom Convoy. He is a truck driver, who owns a trucking company in Saskatchewan.

12. The Defendant Benjamin Dichter resides in Toronto, Ontario. He is one of the organizers of the Freedom Convoy. Dichter is a former Conservative Party of Canada candidate and a prominent supporter of the People's Party of Canada.

13. The Defendant Tamara Lich resides in Medicine Hat, Alberta. She is one of the organizers of the Freedom Convoy and frequently acts as a spokesperson on social media accounts associated with the Freedom Convoy. She is listed as the organizer of the Freedom Convoy's fundraiser on the crowdsourced fundraising platform GoFundMe. Lich is the Secretary for the Maverick Party, a western separatist group formerly known as Wexit Canada, and was also an organizer for the Yellow Vests Canada movement.

14. The Defendant Patrick King resides in Red Deer, Alberta. He is one of the organizers of the Freedom Convoy. King was a co-founder of Wexit Canada and an organizer for the Yellow Vest Canada movement.

15. John Does 1 to 60 are drivers of semi-trucks that are parked in the downtown Ottawa core during the Freedom Convoy protest, blasting air horns and train horns on their trucks as a form of protest. The identities of these truck drivers are unknown at the time of the issuance of the claim.

16. The Plaintiff brings this action pursuant to the *Class Proceedings Act, 1992* on her own behalf and on behalf of all other persons who reside within two blocks of the main protest streets.

17. The proposed members of the Class are:

all persons who reside in Ottawa, Ontario, from Bay Street to Elgin Street and Lisgar Street to Wellington Street.

ORGANIZING THE FREEDOM CONVOY PROTEST

18. In early January 2022, the Defendants began to organize a protest to express their political opposition to COVID-19 health measures. They discussed and created a common plan to have a “Freedom Convoy” of vehicles, including a large number of semi-trailer-tractor trucks, travel from different parts of Canada and converge in the national capital of Ottawa on January 29, 2022.

19. On or around January 14, 2022, the Defendants created a Facebook page called “Freedom Convoy 2022” which they described as a “meeting place to discuss logistics, organization and mobilization to restore our Freedoms”. Indeed, the Defendants used this Facebook page to discuss logistics, organization and mobilization for the Freedom Convoy.

20. On or around January 23, 2022, the Defendants also created a fundraising page for the Freedom Convoy on the crowdsourced fundraising website GoFundMe. The Defendant Lich is listed as the organizer of this GoFundMe page, and the Defendant Dichter is listed as a Team Member.

21. On their GoFundMe page, the Defendants discussed the logistics and organization for the Freedom Convoy and solicited donations from supporters to assist them with their common plan to travel to and occupy Canada’s capital.

22. The Defendants discussed the common goals that they hoped to achieve by organizing the Freedom Convoy, which included forcing Prime Minister Justin Trudeau and the federal government to announce a repeal of all public health measures.

23. The Defendants discussed and coordinated plans for how they would occupy Ottawa and how they would attempt to reach their common goals. They discussed setting up a command room or war room to further strategize once they reached Ottawa.

24. One of the main tactics coordinated by the Defendants, in support of their goal of forcing the federal government to listen to their demands, was for participants to make as much noise as possible when stationed in Ottawa's downtown. To make that noise, the Defendants planned, organized, encouraged and directed Freedom Convoy participants to continuously blast the horns of their vehicles, as described further below.

SETTING UP IN OTTAWA AND MAIN PROTEST STREETS

25. Starting on or around Friday, January 28, 2022, Freedom Convoy vehicles started to arrive in Ottawa. These vehicles included tractor trailers, tractors with no trailers, passenger vehicles, and large recreational vehicles ("RVs").

26. When they arrived in Ottawa, the Freedom Convoy vehicles began to congregate to block many of the streets surrounding Parliament Hill and in the Centretown neighbourhood.

27. Several hundred vehicles have remained camped out in Ottawa's downtown since January 28, 2022, lined up bumper-to-bumper. The clusters of vehicles are predominantly concentrated on the streets between Bay Street to Elgin Street and Laurier Avenue to Wellington Street.

28. For 24 hours per day, the semi-trucks have primarily remained lined and concentrated on Kent Street and Bank Street running north south, and on Wellington Street running east west. The trucks remain running all day and night, with other Freedom Convoy participants organizing the delivery of fuel in jerry cans.

HORN TACTIC

29. One of the main protest tactics employed by Freedom Convoy participants has been to make as much noise as possible to disturb individuals in Ottawa's downtown.

30. To make that noise, the Defendants planned, organized, encouraged and directed Freedom Convoy participants to blast the horns on their vehicles, non-stop, for several hours.

31. The Defendants coordinated their horn-blasting tactic with Freedom Convoy participants via social media channels, including Facebook and YouTube, and via the walkie-talkie app Zello.

32. As one example of this, on January 31, 2022, the Defendant King posted a YouTube video instructing all Freedom Convoy “truckers” to collectively honk for ten minutes straight every hour and half hour.

33. Initially, this honking would last from approximately 7AM to 1AM. On or around February 1, 2022, a new timeframe was coordinated for the honking, which now occurs from approximately 8AM to 11PM.

34. The Defendants have taken to social media and Zello to celebrate the honking and to encourage participants to continue employing this tactic.

35. The types of horns that have been employed as part of the horn-blasting tactic include air horns, which are only to be used for safety warnings, and train horns.

36. Operator manuals for the types of horns being used by the Freedom Convoy provide warnings that they produce “extreme loudness” and can cause permanent hearing damage.

DEFENDANTS’ CONDUCT IS UNLAWFUL

37. The Plaintiffs plead that the Defendants’ ongoing and concerted horn-blasting tactic is unlawful.

38. The Defendants’ conduct is clearly prohibited by sections 2, 3 and 15 of the City of Ottawa Noise By-Law, By-Law No. 2017-255.

39. Section 2 of By-Law No. 2017-255 states that no person shall cause or permit any bass noise, unusual noise or noise likely to disturb the inhabitants of the City.

40. Section 3 of By-Law No. 2017-255 states that no person shall cause or permit the ringing of any bell, sounding of any horn, or shouting in a manner likely to disturb the inhabitants of the City.

41. Section 15 of By-Law No. 2017-255 states that no person shall cause or permit unnecessary motor vehicle noise such as the sounding of the horn, revving of engine and the squealing of tires of any motor vehicle on any property other than a highway.

42. The level of noise emitted by the Defendants also exceeds the noise levels that would be permitted in a workplace setting, contrary to the Federal Occupational Health and Safety Regulations, SOR/86-304 enacted pursuant to the *Canada Labour Code*, RSC, 1985 c. L-2 and contrary to the Ontario Noise Regulation 381/15 enacted pursuant to the *Occupational Health and Safety Act*, RSO 1990, c 01.

43. The Defendants' horn-blasting also constitutes conduct that violates the *Criminal Code of Canada*, RSC 1985, c C-46 pursuant to sections 430(1)(d) (Mischief), 175(1)(d) (Cause Disturbance), and 180(1)(s) (Common Nuisance).

44. Finally, exposure to loud noise for a prolonged period of time and sleep deprivation are both techniques that have been found to constitute torture, and are considered to be cruel, inhumane and degrading treatment under international law.

IMPACT

45. When walking within 50 feet of the semi-trucks blasting their air horns, the sound pressure decibel level is between 100 and 105 constantly. When the train horns on the semis are blasted, the decibel level increases to 120 to 125.

46. For individuals who live in residences beside the streets where the horns are blasting, the sound within the home is approximately 80 decibels.

47. The normal sound in a home is 35 to 40 decibels. A normal conversation is 55 to 65 decibels. A lawn mower can be 88 to 94 decibels.
48. Sleep is best at 30 decibels or below and there can be significant interference with sleep when sound level decibels exceed 45.
49. Each 10 decibel increase in sound level equates to a doubling of the sound in the listener's perception. An increase of 20 decibels is a fourfold increase.
50. Hearing damage can occur at 90 decibel sound pressure level where the exposure is over 30 minutes. At 100 decibels, sound pressure can cause hearing damage in about 15 minutes; at 120 decibel sound pressure hearing damage can occur in a matter of seconds.
51. Prolonged exposure to sound levels of 70 decibels and above can cause psychological distress and interfere with psychological integrity.
52. The truck horns are causing moral and psychological harm to the Class Members. The horns are substantially interfering with the private use and enjoyment of their homes. With horns ending as late as 1am, and no earlier than 11pm, Class Members are experiencing significant sleep disturbances.
53. Class Members who leave their homes for work, groceries or necessities experience significantly elevated sound exposure. Some Class Members are avoiding going out as much as possible and are prisoners in their own homes. Others have been forced to leave their homes and find alternate accommodation. The Class Members are living in daily torment caused by the incessant blasting of truck horns.

PLAINTIFF'S PERSONAL EXPERIENCE

54. The Plaintiff, a resident of the Centretown neighbourhood in the heart of downtown Ottawa, has suffered mental distress, suffering and torment as a result of

the persistent and loud honking from several large trucks which have been camped outside of her residence since Friday, January 28, 2022.

55. While some of the honking sounds are from regular sized motor vehicle horns, the loudest and most persistent honks have come from large transport trucks. Some of these trucks are equipped with horns emit loud honking noises typical of vehicles of their size. A number of the trucks are equipped with horns which are similar in tone and volume to train horns.

56. From within her unit, the sound of all three types of honking horns from the persists at regular and frequent intervals from morning to night, sometimes as late as 1:30 am. With the exception of some short periods of reprieve late in the night, the sound feels to the Plaintiff as if it is nearly constant. The honking of the horns is frequently accompanied by loud music, sounds of shouting and fireworks. The combination of these sounds makes the Plaintiff feel as though she is living in a war zone.

57. The honking horns, in particular, have interfered with the sense of peace, safety and serenity which the Plaintiff previously enjoyed in her home. During the brief periods when the sound of honking horns subsides, the Plaintiff is unable to enjoy the relative quiet because she becomes riddled with anxious anticipation for the moment it will start up again. The Plaintiff has found this anxious anticipation almost as unbearable as the sounds of the horns themselves.

58. The Plaintiff has been unable to enjoy a restful night's sleep since the Freedom Convoy arrived in her neighbourhood. The only way the Plaintiff can fall asleep and temporarily escape the noise is by playing music on external speakers at 70-80% volume and then inserting noise-cancelling earphones or earplugs into her ears.

59. The Plaintiff is fearful every time she ventures outside. She does not leave her residence without first inserting noise-cancelling headphones into her ears. Even with these devices in her ears, the Plaintiff can still hear the sounds of the honking horns

very clearly. The sound is so loud that she can physically feel vibrations inside her ears.

60. When the Plaintiff ventures outside, she is almost immediately subjected to heckling by members of the Freedom Convoy, yelling at her to remove the mask she wears to protect herself and others from contracting COVID-19. When she ignores the heckles, members of the Convoy respond by honking their horns which invariably causes the Plaintiff to flinch. When the Plaintiff flinches, the hecklers cheer loudly.

61. Since Friday January 28, 2022, the Plaintiff has contacted the Ottawa Police Service on at least 14 occasions to complain about the noise and the distress it is causing her. In response to her calls, she has either been told that there's nothing that can be done or that there are officers on the ground who will address the issue, but no one ever comes and the noise continues unabated. The sense that police are impotent to enforce law and order has contributed to the Plaintiff's fear and anxiety which are further exacerbated by the intolerable levels of noise.

62. The Plaintiff loves her community and is heartbroken by the trauma that is being inflicted on her and her neighbours.

PRIVATE NUISANCE

63. The incessant blaring of the high decibel air horns and train horns substantially interferes with the private use and enjoyment of the Class Members' homes. The conduct is totally unreasonable and unjustified.

64. The Defendants Barber, Dichter, Lich and King have organized, planned, encouraged and directed the horn tactic by Defendants John Doe 1 to John Doe 60.

DAMAGES SUFFERED BY CLASS MEMBERS

65. As a consequence of the private nuisance by the Defendants, Class Members suffered injury and damages including:

- (a) emotional and mental distress;
- (b) difficulty concentrating;
- (c) interference with quiet enjoyment of home;
- (d) headaches; and
- (e) difficulty sleeping.

66. The estimated damages per Class Member is \$100 per day of the continued use of the unlawful horn tactic.

67. Some Class Members have incurred special damages for the cost of alternate accommodations and ear plugs, in an amount to be specified at a future date.

PUNITIVE DAMAGES

68. The Defendants deliberately planned the horn tactic to cause distress and discomfort to the Class Members and substantially interfere with the private enjoyment of their homes. The Defendants are aware or ought to be aware that the prolonged use of the extremely loud air horns and train horns can cause permanent hearing damage and psychological harm. The Defendants have acted with wanton disregard towards the residents of Ottawa.

69. This high-handed and callous conduct of the Defendants warrants the condemnation of this Honourable Court. Canada is a free and democratic society with a long tradition of peaceful protest and assemblies. The Defendants have abused those freedoms to cause serious harm to others, innocent bystanders to the Defendants' pursuit of their misguided political goals.

70. The Plaintiff proposes that this action be tried at the City of Ottawa, Ontario.

Dated this 4th day of February, 2022.

CHAMP & ASSOCIATES
Barristers and Solicitors
43 Florence Street
Ottawa, ON K2P 0W6

Per: Paul Champ
LSO: 45305K

Tel: (613) 237-4740
Fax: (613) 232-2680

pchamp@champlaw.ca

ZEXI LI Plaintiff	-and -	Court File No. CHRIS BARBER, BENJAMIN DICTER, TAMARA LICH, PATRICK KING and JOHN DOES 1-60 Defendants
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**ONTARIO
SUPERIOR COURT OF JUSTICE**

STATEMENT OF CLAIM

Proceedings under the *Class Proceedings Act*,
1992

CHAMP & ASSOCIATES
Equity Chambers
43 Florence Street
Ottawa, Ontario K2P 0W6
Tel.: (613) 237-4740
Fax.: (613) 232-2680

Per: Paul Champ
LSUC#: 45305K
Email: pchamp@champlaw.ca

Solicitors for the Plaintiff

This is **Exhibit “E”** referred to
in the Affidavit of **TRUDY MOORE**,
affirmed before me in the City of Ottawa,
in the Province of Ontario,
this 15th day of February, 2022.



A Commissioner for Taking Oaths, etc.



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Yup, it works!



Environ Biol Fish (2015) 98:1899–1914

DEVELOP
SUPPORT COURSE

THESE DOCUMENTS ARE NOT TO BE REPRODUCED

1. 1990年1月1日起，凡在境内销售货物或提供应税劳务的单位和个人，均须依法缴纳增值税。

Figure 10

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Journal of Management Inquiry 23(1)

1. 謝安

DATE	AMOUNT	DESCRIPTION	DATE	AMOUNT	DESCRIPTION
2004-01-01	1000.00	INITIAL DEPOSIT	2004-01-15	50.00	WITHDRAWAL
2004-01-20	200.00	DEPOSIT	2004-02-01	100.00	WITHDRAWAL
2004-02-10	150.00	DEPOSIT	2004-02-20	75.00	WITHDRAWAL
2004-03-01	300.00	DEPOSIT	2004-03-15	120.00	WITHDRAWAL
2004-03-25	180.00	DEPOSIT	2004-04-05	90.00	WITHDRAWAL
2004-04-15	250.00	DEPOSIT	2004-04-25	110.00	WITHDRAWAL
2004-05-01	120.00	DEPOSIT	2004-05-15	60.00	WITHDRAWAL
2004-05-20	280.00	DEPOSIT	2004-06-01	130.00	WITHDRAWAL
2004-06-10	160.00	DEPOSIT	2004-06-20	80.00	WITHDRAWAL
2004-07-01	320.00	DEPOSIT	2004-07-15	140.00	WITHDRAWAL
2004-07-25	190.00	DEPOSIT	2004-08-05	95.00	WITHDRAWAL
2004-08-15	270.00	DEPOSIT	2004-08-25	115.00	WITHDRAWAL
2004-09-01	130.00	DEPOSIT	2004-09-15	65.00	WITHDRAWAL
2004-09-20	290.00	DEPOSIT	2004-10-01	135.00	WITHDRAWAL
2004-10-10	170.00	DEPOSIT	2004-10-20	85.00	WITHDRAWAL
2004-11-01	330.00	DEPOSIT	2004-11-15	145.00	WITHDRAWAL
2004-11-25	200.00	DEPOSIT	2004-12-05	100.00	WITHDRAWAL
2004-12-15	260.00	DEPOSIT	2004-12-25	125.00	WITHDRAWAL
2005-01-01	140.00	DEPOSIT	2005-01-15	70.00	WITHDRAWAL
2005-01-20	310.00	DEPOSIT	2005-02-01	150.00	WITHDRAWAL
2005-02-10	180.00	DEPOSIT	2005-02-20	90.00	WITHDRAWAL
2005-03-01	290.00	DEPOSIT	2005-03-15	120.00	WITHDRAWAL
2005-03-25	160.00	DEPOSIT	2005-04-05	80.00	WITHDRAWAL
2005-04-15	340.00	DEPOSIT	2005-04-25	155.00	WITHDRAWAL
2005-05-01	210.00	DEPOSIT	2005-05-15	105.00	WITHDRAWAL
2005-05-20	270.00	DEPOSIT	2005-06-01	130.00	WITHDRAWAL
2005-06-10	190.00	DEPOSIT	2005-06-20	95.00	WITHDRAWAL
2005-07-01	350.00	DEPOSIT	2005-07-15	160.00	WITHDRAWAL
2005-07-25	220.00	DEPOSIT	2005-08-05	110.00	WITHDRAWAL
2005-08-15	280.00	DEPOSIT	2005-08-25	135.00	WITHDRAWAL
2005-09-01	150.00	DEPOSIT	2005-09-15	75.00	WITHDRAWAL
2005-09-20	320.00	DEPOSIT	2005-10-01	155.00	WITHDRAWAL
2005-10-10	200.00	DEPOSIT	2005-10-20	100.00	WITHDRAWAL
2005-11-01	300.00	DEPOSIT	2005-11-15	140.00	WITHDRAWAL
2005-11-25	170.00	DEPOSIT	2005-12-05	85.00	WITHDRAWAL
2005-12-15	290.00	DEPOSIT	2005-12-25	125.00	WITHDRAWAL
2006-01-01	160.00	DEPOSIT	2006-01-15	80.00	WITHDRAWAL
2006-01-20	330.00	DEPOSIT	2006-02-01	165.00	WITHDRAWAL
2006-02-10	210.00	DEPOSIT	2006-02-20	105.00	WITHDRAWAL
2006-03-01	310.00	DEPOSIT	2006-03-15	145.00	WITHDRAWAL
2006-03-25	180.00	DEPOSIT	2006-04-05	90.00	WITHDRAWAL
2006-04-15	360.00	DEPOSIT	2006-04-25	170.00	WITHDRAWAL
2006-05-01	230.00	DEPOSIT	2006-05-15	115.00	WITHDRAWAL
2006-05-20	290.00	DEPOSIT	2006-06-01	140.00	WITHDRAWAL
2006-06-10	200.00	DEPOSIT	2006-06-20	100.00	WITHDRAWAL
2006-07-01	370.00	DEPOSIT	2006-07-15	175.00	WITHDRAWAL
2006-07-25	240.00	DEPOSIT	2006-08-05	120.00	WITHDRAWAL
2006-08-15	300.00	DEPOSIT	2006-08-25	145.00	WITHDRAWAL
2006-09-01	170.00	DEPOSIT	2006-09-15	85.00	WITHDRAWAL
2006-09-20	340.00	DEPOSIT	2006-10-01	170.00	WITHDRAWAL
2006-10-10	220.00	DEPOSIT	20		

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THE AUTHOR is a faculty member in the Department of Psychology at the University of Illinois at Chicago, Chicago, Illinois. He is also a senior research advisor at the Center for the Study of the Human Mind, University of Illinois at Chicago, Chicago, Illinois.

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You

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section 101 of the Courts of Justice Act, Rule 40.01 of the Rules of Civil Procedure, and section 12 of the Class Proceedings Act.

7. **THIS COURT ORDERS** that any persons having notice of this Order are hereby restrained and enjoined from using air horns or train horns, other than those on a motor vehicle of a municipal fire department, in the geographic location anywhere in the City of Ottawa, in the vicinity of downtown Ottawa, being any streets north of Highway 417, otherwise known as the Queensway, for 10 days from the date of this Order.
8. **THIS COURT ORDERS** that the Defendants Barber, Dichter and Lich forthwith direct that they communicate this Order through their social media and other channels to all persons they know who are or who have been participating in the Freedom Convoy Protest in Ottawa, Ontario, from January 28, 2022, to the present day;
9. **THIS COURT ORDERS** that any police officer with the Ottawa Police Service, and/or the appropriate police authority in the jurisdiction in question (the "Police"), shall have authorization to arrest and remove any person who has knowledge of this Order and who the Police have reasonable and probable grounds to believe is contravening or has contravened any provision of this Order.
10. **THIS COURT ORDERS** that the Police shall retain discretion:
 - a. as to the timing and manner of enforcement of this Order, and specifically retain discretion as to the timing and manner of arrest and removal of any person pursuant to this Order; and
 - b. to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has contravened, any provisions of this Order, upon that person agreeing in writing to abide by this Order.
11. **THIS COURT ORDERS** that any peace officer and any member of the Police who arrests or arrests and removes any person pursuant to this Order shall have authorization to release that person from arrest upon that person agreeing in writing to obey this Order;
12. **THIS COURT ORDERS** that, provided the terms of this Order are complied with, the Defendants and other persons remain at liberty to engage in a peaceful, lawful and safe protest.
13. **NOTICE OF THIS ORDER** may be given by: posting copies of this Order in or around downtown Ottawa; reading the Order to any person, including but not limited to reading the Order over an amplification system published this Order.



File

Text (306) 421-2455...

History

Voicemail

Lines

SMS



(306) 421-2455



(306) 421-2455

5:09 PM

100% fake



(587) 216-2653

4:08 PM

Yup, it works!

You

5:06 PM

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online, including on social media accounts associated with the Defendants, and by distributing copies of this Order to media including CBC, Radio-Canada, CTV, Global News and all daily newspapers in the Ottawa-Gatineau area.

9. **THIS ORDER** shall not apply to persons acting in the course of or in the exercise of a statutory duty, power or authority.

10. **THIS COURT ORDERS** that the costs of this motion shall be in the cause.

11. **THIS COURT ORDERS** that the parties shall appear before the Court in Ottawa by videoconference on February 16, 2022 at 10:00am for the hearing of a motion to continue this Order.

Date of Issuance: 02/07/2022

(306) 421-2455

5:07 PM

This isn't how you serve documents

You

5:07 PM

All that is required is notice, not service

(306) 421-2455

5:08 PM

This is a lie

100% fake



File

Text (306) 421-2455...



This is **Exhibit “F”** referred to
in the Affidavit of **TRUDY MOORE**,
affirmed before me in the City of Ottawa,
in the Province of Ontario,
this 15th day of February, 2022.



A Commissioner for Taking Oaths, etc.

Our File: 2476

February 13, 2022

BY EMAIL

Keith Wilson
Wilson Law Office
Suite 195, 3-11 Bellrose Drive
St. Albert, AB T8N 5C9

Dear Mr Wilson:

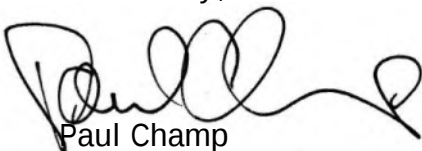
Re: Zexi Li v Chris Barber et al - CFN: CV-22-00088514-00CP

I am sure you are aware that many individuals have blasted their truck horns in downtown Ottawa at different times over the last few days in contravention of the Court Order issued February 7, 2022.

Further to paragraph 3 of the Order, your clients were directed to communicate the Order and its prohibition on the use of truck horns on their social media and other channels. Can you please confirm how and when Mr Barber, Mr Dichter and Ms Lich communicated this order? I would like confirmation by tomorrow, Monday, February 14, 2022, at 12:00pm EST.

In addition, you have not responded to my request to agree upon some terms for the use of amplification systems in downtown Ottawa. You indicated on February 9, 2022 by email that you were reviewing. As you may be aware, sound systems have been set up at several locations, blasting loud music at all hours, with particular intensity over the last two days. We are amenable to some terms that would not totally prohibit the use of sound systems. Your position would be appreciated.

Yours truly,



Paul Champ

This is **Exhibit “G”** referred to
in the Affidavit of **TRUDY MOORE**,
affirmed before me in the City of Ottawa,
in the Province of Ontario,
this 15th day of February, 2022.

A handwritten signature in black ink, appearing to be 'J. G.', written in a cursive style.

A Commissioner for Taking Oaths, etc.



**ONTARIO
SUPERIOR COURT OF JUSTICE**

Electronically issued: 02/15/2022
Délivré par voie électronique
Ottawa

THE HONOURABLE ASSOCIATE CHIEF)
JUSTICE FAYE MCWATT)
)

MONDAY, THE 14TH

DAY OF FEBRUARY, 2022

B E T W E E N:

CITY OF OTTAWA

Applicant

– and –

PERSONS UNKNOWN

Respondents

– and –

ATTORNEY GENERAL OF ONTARIO and
ATTORNEY GENERAL OF CANADA

Intervenors

ORDER

THIS APPLICATION, made by the City of Ottawa was heard this day at the Court House,
161 Elgin Street, Ottawa, Ontario.

ON HEARING the submissions of the applicant, and reading the materials filed, and having
regard to the urgency of the situation,

1. **THIS COURT ORDERS** that an interlocutory injunction is granted, pursuant to section 440 of the *Municipal Act*,
2. **THIS COURT ORDERS** that any persons having notice of this Order are hereby restrained and enjoined from directly or indirectly, by any means whatsoever:
 - a. Breaching the following By-laws of the City of Ottawa: Open Air Fire By-law 2004-163, Fireworks By-law 2003-237, Noise By-law 2017-255, Use and Care of Roads By-law 2003-498, and the Idling Control By-law 2007-266, in particular:
 - i. With respect to Open Air Fire By-law 2004-163:
 1. They shall not set or maintain an open air fire without first having obtained the necessary permit from the Fire Chief;
 - ii. With respect to Fireworks By-law 2003-237:
 1. They shall not discharge any firecrackers or any fireworks.
 - iii. With respect to Noise By-law 2017-255:
 1. They shall not cause any noise likely to disturb the inhabitants of the City, including but not limited to, causing noise by honking air horns, car horns, train horns, in real-time or playing pre-recorded horns
 - iv. With respect to Use and Care of Roads By-law 2003-498:
 1. They shall not encumber or damage a highway by any means, including but not limited to, encumbering or damaging the highway with tents, structures, or appliances;
 2. They shall not set or carry fire on a highway; and
 3. They shall not throw, pile, store or cause any material to be thrown or piled upon a highway except for the purpose of having it immediately delivered upon adjacent premises.
 - v. Idling Control By-law 2007-266 and in particular:

1. They shall not cause or permit a vehicle to idle for more than three (3) consecutive minutes in a sixty (60) minute period, unless:
 - a. it is an occupied vehicle, within the demonstration zone as described in Appendix A to this order, and the temperature outside is less than negative fifteen (15) degrees Celsius including the windchill value as determined by the Environment Canada temperature readings; or
 - b. it is an occupied vehicle, outside the demonstration zone as described in Appendix A to this order, and the temperature outside the vehicle is less than five degrees Celsius including the windchill value as determined by the Environment Canada temperature readings.
 - b. physically preventing, impeding, restricting or in any way physically interfering with, or counselling others to impede, restrict or in any way physically interfere with, another person's compliance with this order;
 - c. threatening, harassing or intimidating the applicant's employees, servants, agents or other persons engaged in the administration or enforcement of municipal by-laws; and
 - d. physically interfering with or counselling others to physically interfere with the performance by the applicant of its obligations under the *Municipal Act, 2001* and its contractual relationships with its employees, servants, agents or other persons having business with the applicant.
3. **THIS COURT ORDERS** that the respondents and each of them, and any and all persons having knowledge of this Order, forthwith remedy any contraventions of the By-laws as set out in subsection 2(a) of this Order, and;
4. **THIS COURT ORDERS** that this order be directed to the Sheriff of the County of Ottawa for enforcement and directs the Ottawa Police Service, and any Police Service assisting the Ottawa Police Service, to assist the Sheriff in the enforcement of the order by removing from the subject property any person contravening its provisions, and/or removing any objects being used in

contravention of bylaws, subject to the discretion of the police, and any Police Service assisting the Ottawa Police Service, with respect to the timing and means of enforcement.

5. **THIS COURT ORDERS** that the terms of this Order shall remain in force until varied or discharged by a further Order of the Court.

6. **THIS COURT ORDERS** that, provided the terms of this Order are complied with, the Respondents and other persons remain at liberty to engage in a peaceful, lawful and safe protest.

7. **THIS ORDER** shall not apply to persons acting in the course of or in the exercise of a statutory duty, power or authority.

8. **NOTICE OF THIS ORDER** may be given by: posting copies of this Order in or around downtown Ottawa; reading the Order to any person, including but not limited to reading the Order over an amplification system, and publishing this Order online.

9. **THIS COURT ORDERS** that the terms of this Order bind the respondents and every other person or legal entity who is subject to this Order and is given notice of the Order, as of the time such respondents, person or legal entity first receives notice of the Order, and whether or not such respondents, person or legal entity has been served with a copy of the Order.



McWatt A.C.J.S.C.J.

"Electronically Issued; February 15, 2022"

Appendix “A”

Appendix is a map the is included at section 3(ia) of the Idling Control By-law 2007-266.



THE CITY OF OTTAWA
Applicant

-and- PERSONS UNKNOWN
Respondents

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
OTTAWA

ORDER

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Ottawa, ON K1P 1J9

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T: 613.237.5160 main
F: 613.230.8842

Lawyers for the Applicant

This is **Exhibit “H”** referred to
in the Affidavit of **TRUDY MOORE**,
affirmed before me in the City of Ottawa,
in the Province of Ontario,
this 15th day of February, 2022.



A Commissioner for Taking Oaths, etc.



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← Tweet

Adrian Harewood

@CBCAdrianH

Day 18 of the #trucker occupation: Tonight on Wellington St. in downtown #Ottawa across from Parliament Hill. Despite the injunction the blaring of horns continues.



0:31 3,402 views

10:29 PM · Feb 14, 2022 · Twitter for iPhone

29 Retweets

10 Quote Tweets

62 Likes

Reply

Retweet

Like

Share

Tweet your reply

Reply

Lynn @RadicalSister15 · 13h

Replying to @CBCAdrianH

And gee no ticketing despite 2 court injunctions, but I'll give OPS a pass tonight given today's news. I'm sure the threat level has gone up.

3

Retweet

Like

Share

Quigg @cooke_millard · 9h

Replying to @CBCAdrianH and @MissHelveticaB

Is that someone attempting to do an Indigenous-style dance in the middle of that square..? Ik they've been appropriating culture but Jesus Christ...

1

Retweet

Like

Share

Kevin Gray @KevinGr41485878 · 13h

Replying to @CBCAdrianH

Wow. This is just a short taste of what it's like downtown. My heart goes out to the residents near this location. I can't imagine. Didn't they win? Ford announced the plan for every now? Victory Celebration? Go home.

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Relevant people

Adrian Harewood

@CBCAdrianH

News Anchor - @CIB6. Host of Our Ottawa current affairs mag; Professor @JSchool @CABJMedia, @CA

What's happening

News · Yesterday

PM Trudeau invokes Emerg Act in response to ongoing protests

Trending with Emergencies Act, Measures Act

#KFCScorcher

Finger Lickers Beware

Promoted by KFC Canada

Trending in Canada

#RamRanchResistance

2,191 Tweets

Trending in Canada

#BattleOfBillingsBridge

1,732 Tweets

World news · LIVE

Ukraine: Russia says it is withdrawing some troops f the Ukraine border

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Messages

https://twitter.com/CBCAdrianH/status/1493427270958166019



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Tweet

Julie S. Lalonde Retweeted

Peggy Blair

@peggy_blair

Two court injunctions in place along with a state of emergency and truck horns are still blaring on Wellington without any enforcement from the police or their OPP and RCMP reinforcements.

10:50 PM · Feb 14, 2022 · Twitter Web App

396 Retweets

25 Quote Tweets

1,415 Likes

Tweet your reply

Reply

conservatives suck @LloydWasser · 12h

Replying to @peggy_blair

Justin needs to remove the Ottawa Police and the OPP from the city they've been compromised. Bring in the military and quash this thing once and for all. Organizers cuffed and charged trucks seized and auctioned off, other vehicles towed and impounded, kids rescued

3

1

34

Show replies

Stephen John Ford @1mohawklawyer · 3h

Replying to @peggy_blair

White extremism, apparently, is now kosher with Canadian law enforcement

8

8

36

Nicolas Robidoux @NicolasRobidoux · 3h

What do you mean, "now"? #TruckersConvoy

1

1

13

Dusty - boosted and turbocharged @thirdmanogie · 11h

Replying to @peggy_blair and @JulieSLalonde

How one of these truckers hasn't been pulled from their trucks and Reg Denny'd is beyond me. Congrats, Ottawa, for all being collectively better people than I am. I don't know if I could have remained sane this long.

8

1

19

Dusty - boosted and turbocharged @thirdmanogie · 2h

FYI, I am advocating non-violence in spite of what our natural reactions to assault may be. This is meant to congratulate the good people of Ottawa on their restraint and professionalism. For the bouncy castle insurrectionists, go home and stop infringing on the rights of others.

1

1

Trying to survive in Doug Fords Ontario @JasonBF73 · 3h

Replying to @peggy_blair

It's not as easy as just walking in and arresting them. I believe some of these people will not leave without a fight. With the seizure of weapons at Courtts we can be sure that there are the same within Ottawa.

7

18

Vanessa Williams @fridgebuzz · 2h

That's what they said about Windsor. "People are..."

Search Twitter

Relevant people

Peggy Blair

@peggy_blair

Ottawa realtor, non mystery author, ren animal lover, boxer, Indigenous law.

What's happening

News · Yesterday

PM Trudeau invokes Emerg Act in response to ongoing protests

Trending with [Emergencies Act](#), [Measures Act](#)

#KFCScorcher

Finger Lickers Beware

Promoted by KFC Canada

Gaming · Trending

#Wordle241

People try to guess today's f six tries or fewer in brainteas 5,709 Tweets

Trending in Canada

#BattleOfBillingsBridge

1,736 Tweets

World news · LIVE

Ukraine: Russia says it is withdrawing some troops f the Ukraine border

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https://twitter.com/peggy_blair/status/1493432406224904197

Court File No. CV-22-00088514-00CP

ZEXI LI

- and -

CHRIS BARBER, BENJAMIN
DICTER, TAMARA LICH, PATRICK KING and
JOHN DOES 1-60

Plaintiff (Moving Party)

Defendants (Responding Parties)

ONTARIO
SUPERIOR COURT OF JUSTICE

AFFIDAVIT OF TRUDY MOORE
(Sworn February 15, 2022)

CHAMP & ASSOCIATES
Equity Chambers
43 Florence Street
Ottawa, ON K2P 0W6
Tel.: (613) 237-4740
Fax.: (613) 232-2680

Per: Paul Champ
LSUC#: 45305K
Email: pchamp@champlaw.ca

Solicitors for the Plaintiff

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
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JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50,
JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55,
JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

**AFFIDAVIT OF JEREMY KING
Affirmed February 15, 2022**

I, JEREMY KING, of the Town of Newmarket in the Province of Ontario, AFFIRM:

1. I am the Executive Vice President of King International Advisory Group (“KIAG”), retained on behalf of the Plaintiff in this matter to collect evidence concerning certain of the named individual defendants and proposed defendants in

this action, and to track social media relating to the Ottawa “Freedom Convoy” protest and its organization and activities. I have been primarily responsible for this investigation, and directed the work of others at KIAG in this regard. As such, I have personal knowledge of the matters contained in this Affidavit. Where I have made statements based on information and belief, I have stated the source of the information and believe it to be true.

2. I am aware that, on February 7, 2022, a Judge of the Ontario Superior Court of Justice granted an Order for an injunction (the “Injunction Order”), prohibiting the use of air horns and train horns in downtown Ottawa for a period of 10 days. I have seen and reviewed a copy of this Order.

3. During my investigation, I have reviewed statements and information from the Defendants Barber, Dichter, Lich, and King as well as other members of the Freedom Convoy protest on the following social media platforms: Zello; Twitter; Facebook; Instagram; Telegram; Discord; Reddit; TikTok; BitChute; Rumble; and Dave Rubin’s Report. Organizers of the Freedom Convoy, including the named Defendants, also host regular “press conferences” streamed via video and made available via Facebook Live and YouTube.

4. During the course of my investigation, I have not seen any posts or statements by the Defendants Dichter, Lich, or Barber communicating the Injunction Order to Convoy participants. I note the following with respect to the named Defendants:

Benjamin Dichter

5. I reviewed statements and information from the Defendant Dichter’s known social media profiles, which include Twitter account @BJDichter and Instagram account @bjdichterxo. I did not see any posts or statements on this account communicating the Injunction Order to Freedom Convoy participants.

Tamara Lich

6. I reviewed statements and information from the Defendant Lich's known social media profiles, which include Twitter account @Tamara_MVC and TikTok account tamaralich. I did not see any posts or statements on these accounts communicating the Injunction Order to Freedom Convoy participants.

7. I did, however, see a post on the Freedom Convoy 2022 public Facebook page made on February 12, 2022 at 2:27PM by the Defendant Lich stating "We have the support of a Superior Court judge who has stated numerous times that we have a legal right to be here and to protest peacefully, and peaceful we shall remain". Lich makes no mention in this post of the fact or terms of the Injunction Order. Attached hereto and marked as **Exhibit "A"** is a copy of Lich's Facebook post dated February 12, 2022.

Chris Barber

8. I reviewed statements and information from the Defendant Barber's known social media profiles, which include TikTok accounts bigred19755 and chrisbarber1691 and Facebook account Christopher.barber.94009. I did not see any posts or statements on these accounts communicating the Injunction Order to Freedom Convoy participants, but saw one post that does refer to the Injunction Order. On February 9, 2022, Mr Barber posted himself on TikTok "live from Ottawa", stating there is "an order in place to keep the horns down". He then advises viewers that if they see a "large mass of police" approaching their trucks, they should:

...lock that door, crawl into that bunk but before you do that **grab that horn switch and don't let go. Let that fucking horn go no matter what time it is and let it roll as long as possible, until they're busting your fucking windows down.** We want everybody to know when the time comes, and that's the way to do it. When that happens, do that guys please. Let that horn go and don't let it go when we see that mass force of police coming at you. [...] We'll see if we can fire some shit up.

Mr Barber's TikTok video posted February 9, 2022 can be accessed online at the following link:

https://www.tiktok.com/@bigred19755/video/7062842855907200262?is_copy_url=1&is_from_webapp=v1.

Patrick King

9. I also reviewed statements and information from the Defendant King's known social media profiles, which include Facebook account The Real Pat King and Instagram account @real_patrick_king.

10. I saw on Mr King's public Facebook page, "The Real Pat King", a Facebook Live video initially broadcast on February 7, 2022 starting at 3:03PM, and which can be accessed online using the link: <https://fb.watch/b1dCQTIMAI/>. The words "BREAK BREAK BREAK" appear under the video on the Facebook page. Starting around 10 seconds into this video, the Defendant King states he wants all truckers' attention and tells them to "break break break". He then makes the following statements throughout the video:

- (a) at approximately 0:28, he states he has a message that needs to go out to "every trucker, everybody on the Convoy" and that everybody needs to be "dead silent on the horns";
- (b) at approximately 0:54, he states that a Judge has issued an injunction against the horns for 10 days, and repeats that there needs to be "silence on the horns";
- (c) at approximately 1:10, he states, "This is their grounds to arrest you and pull you out of your trucks";
- (d) at approximately 2:50, he states, "For the next ten days, you cannot blast your horns. I understand it's hard, we love them, we absolutely love them, but no more horns";
- (e) at approximately 3:55, he states, while laughing, "Remember, these people haven't been able to sleep for 10 days. Okay, it's kind of funny. I'm not going to laugh. I'm not going to lie, it's pretty hilarious";
- (f) at approximately 4:07, he states, "So now, you've got the citizens of Ottawa requesting the municipality of Ottawa to put in an injunction to stop the horns, and now they put an injunction in there. And now they're

asking for the Feds to come and negotiate and get us out of their city. It's working, it's working beautiful. It's awesome guys. I'm not laughing, you're laughing. It's kind of funny, it's kind of funny how we can hug and laugh and have a good time, and things are working. Ladies and gentlemen, from the bottom of my heart, great job out there. You're doing fantastic, let's keep up that great work. Let's keep up that enthusiasm";

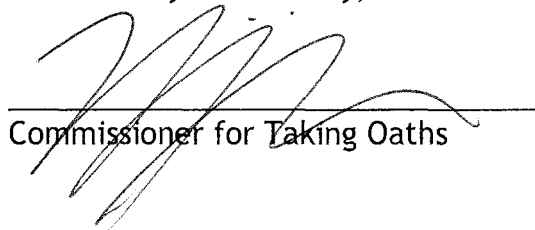
(g) at approximately 5:00, he repeats to "stop on the horns" and that "the injunction's been put in for 10 days".

11. I also saw on Mr King's public Facebook page, "The Real Pat King", a subsequent Facebook Live video initially broadcast on February 8, 2022 starting at 9:39AM, and which can be accessed online using the link: <https://www.facebook.com/therealpatking/videos/653197749066349/>. Starting around 7 minutes and 16 seconds into this video, the Defendant King says: "I don't give a shit anymore. It's game on boys. Blow those horns. Let them go. Let them fire as loud as you can. I don't give a shit anymore."

12. I have not seen any other posts or statements on these or other accounts which I know to be associated with the Defendants Barber, Dichter, Lich, King, or other Freedom Convoy organizers communicating the Injunction Order to Freedom Convoy participants.

13. I make this affidavit in support of the plaintiff's motion for injunctive relief and for no improper purpose.

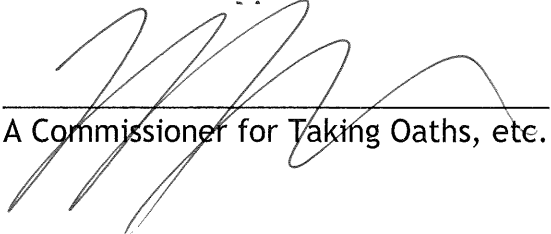
AFFIRMED BEFORE ME REMOTELY)
in accordance with O. Reg. 431/20)
by videoconference between)
Newmarket, ON (affiant) and)
Ottawa, ON (commissioner))
this 15th day of February, 2022.)


Commissioner for Taking Oaths



JEREMY KING

This is **Exhibit "A"** referred to
in the Affidavit of **JEREMY KING**,
affirmed before me
this 15th day of February, 2022.



A Commissioner for Taking Oaths, etc.



Sincerely,
Tamara

15K

1.3K Comments 1K Shares

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See more of Freedom Convoy 2022 on Facebook

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OF

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Court File No. CV-22-00088514-00CP

ZEXI LI**- and -****CHRIS BARBER, BENJAMIN
DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOES 1-60**

Plaintiff (Moving Party)

Defendants (Responding Parties)

**ONTARIO
SUPERIOR COURT OF JUSTICE****AFFIDAVIT OF JEREMY KING****CHAMP & ASSOCIATES**Equity Chambers
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Ottawa, ON K2P 0W6
Tel.: (613) 237-4740
Fax.: (613) 232-2680Per: Paul Champ
LSUC#: 45305K
Email: pchamp@champlaw.ca**Solicitors for the Plaintiff**

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PAT KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10,
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JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55,
JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants/Responding Party

**FACTUM OF THE PLAINTIFF
(Motion for Extension of Interlocutory Injunction)**

PART I - THE FACTS

Overview

1. On February 7, 2022, this Honourable Court granted an interlocutory injunction in this proceeding, ordering a cessation of the intolerable horn honking that had been occurring in downtown Ottawa since the beginning of the Freedom Convoy protest on January 28, 2022.

2. The Court's Order directs that:

any persons with notice of the Court's Order are hereby restrained and enjoined from using air horns or train horns, other than those on a motor vehicle of a municipal fire department, in the geographic location anywhere in the City of Ottawa, in the vicinity of downtown Ottawa, being any streets north of Highway 417, otherwise known as the Queensway, for 10 days from the date of this Order.

3. Pursuant to the Order, the parties are to appear before the Court in Ottawa by videoconference on February 16, 2022 at 10:00AM for a hearing of the motion to continue the interlocutory injunction.

4. The Plaintiff seeks to have the Order issued on February 7, 2022 varied to include additional terms as follows:

- a. Enjoining and restraining any persons having Notice of the Order from ordering, requesting, inciting, counselling, promoting, or encouraging in any manner whatsoever, either directly or indirectly, via social media or otherwise, any person to use air horns or train horns in downtown Ottawa for as long as the Order is in effect; and
- b. Requiring the Defendant King to communicate the Order through his social media and other channels to all persons they know who are or who have been participating in the Freedom Convoy Protest in Ottawa; and
- c. Directing the Sheriff of the City of Ottawa to enforce the terms of this Order and directing the Ottawa Police Service and Ontario Provincial Police, as the case may be, to assist the Sheriff in enforcing the Order upon request, in accordance with 141 of the *Courts of Justice Act*, R.S.O. 1990, c. C-43.

5. The Plaintiff also seeks an Order continuing the interlocutory injunction, on the varied terms described above, for a period of sixty (60) days.

6. An extension of the Order, including the requested additional terms, is required, since Freedom Convoy vehicles continue to occupy downtown Ottawa and the horn honking continues. The Plaintiff and other members of the proposed class continue to face irreparable harm.

Facts

7. Prior to the Court’s Order on February 7, 2022, Freedom Convoy vehicles had been honking horns near the Plaintiff’s apartment from morning to night since January 28, 2022, sometimes as late as 1:30AM. With the exception of some short periods of reprieve late in the night, the sound felt like it was nearly constant.¹

8. Following the Court’s Order on February 7, 2022, the Defendant Patrick King (“King”) broadcast a Facebook live video on his “The Real Pat King” Facebook page, with the words “BREAK BREAK BREAK” below it. In this video, King stated that he had a message that needed to go out to “every trucker, everybody on the Convoy”. He then advised viewers that a judge had issued an injunction against the horns for 10 days, and emphasized that there needed to be “silence on the horns”.²

9. The Plaintiff noticed that the horn honking—which had intensified during the motion hearing—stopped almost completely following King’s Facebook Live video³.

10. The loud and persistent honking in downtown Ottawa subsided significantly for several days.⁴ From around 3:30PM on February 7, 2022 to the morning of February 10, 2022, the Plaintiff heard very occasional horn honking around her building. On occasions when she did hear honking, it was generally fairly brief. In place of the honking, she noticed that the vehicles parked outside her building were loudly and frequently revving their engines instead.⁵

11. Following the granting of the Order, copies were distributed to media and daily newspapers and published online.⁶ In turn, the terms of the Order were reported on

¹ Affidavit of Zexi Li, affirmed February 4, 2022 [attached as Exhibit “A” to Affidavit of Zexi Li, affirmed February 11, 2022) at paras 6, 8-9

² Affidavit of Zexi Li, affirmed February 13, 2022 (“Li February 13 Affidavit”) at paras. 6-9

³ Li February 13 Affidavit at para. 10

⁴ Li February 13 Affidavit at para. 10; Affidavit of Sean Flynn affirmed February 14, 2022 (“Flynn Affidavit”) at paras. 9-10

⁵ Li February 13 Affidavit at para. 11

⁶ Affidavit of Trudy Moore (“Moore Affidavit”), affirmed February 15, 2022, at paras.3,5

widely by both local and national media.⁷ A copy of the Order was also published in a news release put out by the Ottawa Police Service (“OPS”), and published again in a tweet from the OPS Twitter account.⁸

12. However, Freedom Convoy leaders and organizers have, both directly and indirectly, encouraged the honking to continue. The Defendants Barber, Lich, and Dichter have failed to communicate the Order through their social media and other channels to Freedom Convoy participants, in violation of paragraph 3 of the current Order.⁹ On February 8, 2022, the Defendant King posted a Facebook Live video expressly encouraging Freedom Convoy participants to start honking their horns again, in violation of the Court’s Order.¹⁰

13. Since February 10, 2022, Freedom Convoy participants have started to engage in more frequent, prolonged and loud horn honking.¹¹ This behaviour has occurred in blatant disregard for this Court’s Order.

14. As of today’s date, there remain hundreds of large trucks parked in downtown Ottawa.¹² Media reports have estimated that approximately 400 trucks continue occupying the several blocks around the Parliament Building.¹³ There is no indication of the Convoy protestors leaving anytime soon.

15. On February 15, 2022, the City of Ottawa obtained its own interlocutory injunction Order, restraining and enjoining persons with notice of the Order from violating City of Ottawa By-Laws relating to: Open Air Fire; Fireworks; Noise; Use and Care of Roads; and Idling.¹⁴ Despite this Order, the honking downtown continues.¹⁵

⁷ Moore Affidavit at paras. 4, 6-8

⁸ Moore Affidavit at para. 9

⁹ Moore Affidavit at paras. 13-14

¹⁰ Affidavit of Jeremy King, affirmed February 15, 2022 (“King Affidavit”) at para. 11

¹¹ Li February 13 Affidavit at paras. 12-16; Flynn Affidavit at paras. 11-12

¹² Li February 13 Affidavit at para. 17 and Exhibit “B”; Flynn Affidavit at paras. 13-14

¹³ Li February 13 Affidavit at para. 17 and Exhibit “B”

¹⁴ Moore Affidavit at para. 14 and Exhibit “G”

¹⁵ Moore Affidavit at para. 15 and Exhibit “H”

16. Notwithstanding the fact that a separate injunction has now been granted to the City of Ottawa, the Plaintiff still seeks an extension of the more narrowly focused horn-honking injunction, with varied terms to encourage greater compliance and enforcement.

PART II - ISSUES AND ARGUMENT

17. The issue in this motion is whether this Honourable Court should vary and continue the interlocutory injunction Order restraining and enjoining persons with notice of the Order from using air horns and train horns in downtown Ottawa.

Legal Framework

18. Rule 40.02(2) provides that, where an interlocutory injunction is granted on a motion without notice, an extension may be granted on a motion with notice to every party affected by the order, unless the judge is satisfied that because a party has been evading service or because there are other exceptional circumstances, the injunction ought to be extended without notice to the party.

19. Rule 40.02(3) provides that an extension may be granted on a motion without notice for a further period not exceeding ten days.

20. In cases involving Defendants who are named as “John Does” or “Persons Unknown”, the notice requirement has been found to have been met where the Order has been posted and communicated publicly, giving anyone who wished to respond to the motion the opportunity to do so.¹⁶

¹⁶ See e.g. *Foxgate Development Inc. v. Jane Doe*, 2020 ONSC 5038 at para. 3. See also *MacMillan Bloedel Ltd. v. Simpson*, [1996] 2 SCR 1048 at para. 4, where the SCC noted that the initial *ex parte* Order for an interim injunction (against named Defendants as well as “John Doe, Jane Doe, and Persons Unknown”) was subsequently “amplified, refined, and extended” and then converted from an interim to interlocutory injunction.

21. In considering whether an interlocutory injunction ought to be extended, the test set out in *RJR MacDonald Inc. v. Canada (Attorney General)*, [1994] 1 SCR 311 continues to apply. That is, the Court must determine: (1) whether there remains a serious question to be tried; (2) whether irreparable harm will result to the plaintiff if the relief is not granted; and (3) which of the parties will suffer the greatest harm from the extension or refusal of an extension of the Order.

Persons affected by the Order have had sufficient notice

22. Persons affected by the Order have now been given sufficient notice of its terms, and no one has applied to the Court to have this Order varied or set aside.

23. In accordance with paragraph 8 of the Order, copies were distributed to media and daily newspapers and published online.¹⁷ In turn, the terms of the Order were reported widely by both local and national media.¹⁸ A copy of the Order was also published in a news release put out by the Ottawa Police Service (“OPS”), and published again in a tweet from the OPS Twitter account.¹⁹

24. It is clear that persons affected by the Order have received notice of it, since the honking associated with the Freedom Convoy protest largely ceased immediately following the granting of the Order.

25. Importantly, the Plaintiff’s own experience was that the honking intensified during the hearing of the motion by videoconference on February 7, 2022²⁰, but stopped almost entirely after the Defendant Patrick King (“King”) broadcast a video to Convoy participants on Facebook Live and YouTube immediately after the Court’s granting of the injunction.²¹ In his video, King advised “every trucker, everybody on the

¹⁷ Moore Affidavit at paras. 3, 5

¹⁸ Moore Affidavit at paras. 4, 6-8

¹⁹ Moore Affidavit at para. 9

²⁰ Li February 13 Affidavit at para. 5

²¹ Li February 13 Affidavit at para. 10

Convoy” that a judge had issued an injunction against the horns for 10 days and that there needed to be “silence on the horns” for that period.²²

26. In a CBC interview with a Convoy participant shortly after the granting of the Order, reporter Evan Dyer asked why the honking had stopped. The individual being interviewed replied that the honking downtown had stopped because of the Court’s Order, and that he had “heard the instructions” not to honk.²³

27. As for the Defendant King in particular, it is clear from his video broadcasts to Convoy participants that he has sufficient notice of the Order. In addition to this, however, the Plaintiff’s counsel also sent a copy of the Order to King by both email²⁴ and SMS text message²⁵ on February 10, 2022.

Grounds for continuing the Order

28. The Freedom Convoy protest in downtown Ottawa remains ongoing. The evidence of the Plaintiff and of another affiant, Sean Flynn, is that hundreds of large trucks are still parked in downtown Ottawa.²⁶ Media reports have estimated that approximately 400 trucks are still occupying the blocks around the Parliament Building.²⁷ There is no indication of the Convoy protestors leaving anytime soon.

29. The Court’s Order restraining honking was largely respected by Convoy participants for several days.²⁸ However, Convoy participants have more recently been engaging in more frequent, prolonged and loud horn honking.²⁹

30. The Plaintiff and other members of the proposed class face the same irreparable harm that existed when the Order was first granted. There is still a serious issue to be

²² Li February 13 Affidavit at para. 9

²³ Moore Affidavit at para. 8

²⁴ Moore Affidavit at para. 10

²⁵ Moore Affidavit at para. 11

²⁶ Li February 13 Affidavit at para. 17; Flynn Affidavit at paras. 13-14

²⁷ Li February 13 Affidavit at para. 17 and Exhibit “B”

²⁸ Li February 13 Affidavit at paras. 10-11; Flynn Affidavit at paras. 9-10

²⁹ Li February 13 Affidavit at paras. 12-16; Flynn Affidavit at paras. 11-12

tried with respect to the claim in nuisance, and the balance of convenience also still favours the granting of the injunction.

31. Notwithstanding the separate and broader interlocutory injunction granted to the City of Ottawa on February 14, 2022³⁰, the honking downtown has continued.³¹

32. To the extent that a number of Convoy participants are already flouting the Order and engaging in unlawful and harmful conduct, this should not be a reason for declining to continue the Order. Similarly, the Court should not decline to continue the Order based on any concerns it may have about the willingness of police to enforce it.

33. Faced with similar circumstances in *CNR v. Chief Chris Plain*, 2012 ONSC 7356, Justice Brown of this Court held that:

I cannot bring myself to decline to grant the continuation order sought by a plaintiff whose legal rights are being infringed and where the conduct of the protesters is causing irreparable harm to the plaintiff and others who rely on the spur line, even where the court has no practical means to enforce the order in the circumstances willingness of the local police agency to enforce a court order.³²

34. Similarly, in *Foxgate Developments Inc. v. Doe et al*, 2020 ONSC 5038, the Court granted the continuation of the injunction Order, notwithstanding the fact that the Defendants had “ignored this court process and ignored the orders of this court”.³³ In granting the continuation of the Order, the Court emphasized:

Open and flagrant disregard for regular order, laws and orders of this court cannot be condoned or tolerated. If the rule of law is not upheld in the circumstances of this case, chaos, mayhem and anarchy would prevail. This is not the way our Canadian society is. Central to our values is the rule of law. It applies to everyone, without exception.³⁴

³⁰ Moore Affidavit at para. 14 and Exhibit “G”

³¹ Moore Affidavit at para. 15 and Exhibit “H”

³² *CNR v. Chief Chris Plain*, 2012 ONSC 7356 at para. 44

³³ *Foxgate Developments Inc. v. Doe et al*, 2020 ONSC 5038 (“*Foxgate*”) at para. 71

³⁴ *Foxgate* at para. 77

35. Accordingly, the Plaintiff requests that the interlocutory injunction be continued for a further period of sixty (60) days, and on varied to include the additional terms described below.

Grounds for varying the Order

36. The Plaintiff seeks to have the Order varied to include: (1) a term enjoining and restraining any persons having Notice of the Order from ordering, requesting, inciting, counselling, promoting, or encouraging in any manner whatsoever, either directly or indirectly, via social media or otherwise, any person to use air horns or train horns in downtown Ottawa for as long as the Order is in effect; and (2) a term requiring the Defendant King to communicate the Order through his social media and other channels to all persons they know who are or who have been participating in the Freedom Convoy Protest in Ottawa.

37. It appears that Convoy participants have become emboldened to act with blatant disregard for the Court's Order, in part due to the messaging by the Freedom Convoy's leadership.

38. Immediately after the Order was granted, the Defendant King notified Convoy participants of this Order in a Facebook Live video and directed them to silence their horns for 10 days.³⁵ King's instructions to Convoy participants appeared effective, as the honking did largely stop for a several days. Unfortunately, King subsequently released another Facebook Live video on February 8, 2022, encouraging Convoy participant to ignore the Court Order and resume their honking.³⁶

39. The Defendants Lich, Barber, Dichter have indirectly encouraged the honking, by failing to comply with paragraph 3 of the existing Order which required them to communicate the Order to Convoy participants through their social media and other

³⁵ LI February 13 Affidavit at para. 9

³⁶ King Affidavit at para. 11

channels.³⁷ In fact, the Defendant Lich has mischaracterized this Honourable Court's Order by posting a comment to the Freedom Convoy 2022 public Facebook page stating that "We have the support of a Superior Court judge who has stated numerous times that we have a legal right to be here and to protest peacefully". Lich does not communicate the terms of this Court's order anywhere in that post, or anywhere else on the Freedom Convoy 2022 Facebook page.³⁸

40. The Plaintiff submits that compliance with the Order may be better achieved through the inclusion of additional terms focused on the actions of the Convoy's leadership. If such language were included in the Order and disobeyed, the Plaintiff could then initiate contempt proceedings against individuals encouraging participants to breach the Order.³⁹

41. The Plaintiff submits that compliance with and enforcement of the Order may also be better achieved through the inclusion of an additional term directing enforcement in accordance with section 141 of the *Court of Justice Act*.⁴⁰

PART III - ORDER REQUESTED

42. The Plaintiff submits that the motion should be granted and the Court should issue an Order extending the interlocutory injunction for a period of sixty (60) days and varying the Order to include additional terms as follows:

- d. Enjoining and restraining any persons having Notice of the Order from ordering, requesting, inciting, counselling, promoting, or encouraging in any manner whatsoever, either directly or indirectly, via social media or otherwise, any person to use air horns or train horns in downtown Ottawa for as long as the Order is in effect; and

³⁷ King Affidavit at paras. 3-12 and 12; Moore Affidavit at paras. 12-13

³⁸ King Affidavit at paras. 6 and 12

³⁹ See e.g. *Alberta Health Services v Pawlowski*, 2021 ABQB 493 at paras. 27-28, where contempt proceedings were initiated, following violation of a similar term in an injunction order

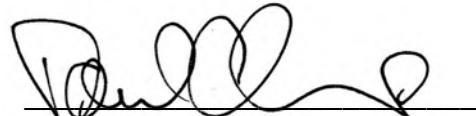
⁴⁰ Similar to the language included at para. 4 of the Injunction Order granted to the City, dated February 15, 2022 (Exhibit "H" to the Moore Affidavit)

- e. Requiring the Defendant King to communicate the Order through his social media and other channels to all persons they know who are or who have been participating in the Freedom Convoy Protest in Ottawa; and
- f. Directing the Sheriff of the City of Ottawa to enforce the terms of this Order and directing the Ottawa Police Service and Ontario Provincial Police, as the case may be, to assist the Sheriff in enforcing the Order upon request, in accordance with 141 of the *Courts of Justice Act*, R.S.O. 1990, c. C-43.

43. The Plaintiff seeks costs of this motion in the cause.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Dated at Ottawa, Ontario this 15th day of February, 2022.



Paul Champ (LSO #45305K)
Christine Johnson (LSO #62226I)
Bijon Roy (LSO #50528K)
Emilie Taman (LSO #52049U)

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Solicitors for the Plaintiff

SCHEDULE A - LIST OF AUTHORITIES

Alberta Health Services v Pawlowski, 2021 ABQB 493

CNR v. Chief Chris Plain, 2012 ONSC 7356

Foxgate Development Inc. v. Jane Doe, 2020 ONSC 5038

MacMillan Bloedel Ltd. v. Simpson, [1996] 2 SCR 1048

SCHEDULE B - STATUTES AND REGULATIONS

Courts of Justice Act, R.S.O. 1990, c. C-43 at section 141

Rules of Civil Procedure, RRO 1990, Reg. 194, Rules 40.01, 40.02

Courts of Justice Act

R.S.O. 1990, CHAPTER C.43

Consolidation Period: From December 2, 2021 to the e-Laws currency date.

Last amendment: 2021, c. 34, Sched. 4.

**PART VII
COURT PROCEEDINGS**

Civil orders directed to sheriffs

141 (1) Unless an Act provides otherwise, orders of a court arising out of a civil proceeding and enforceable in Ontario shall be directed to a sheriff for enforcement.

Police to assist sheriff

(2) A sheriff who believes that the execution of an order may give rise to a breach of the peace may require a police officer to accompany the sheriff and assist in the execution of the order. R.S.O. 1990, c. C.43, s. 141.

Courts of Justice Act
R.R.O. 1990, REGULATION 194
RULES OF CIVIL PROCEDURE

Consolidation Period: From October 15, 2021 to the e-Laws currency date.

Last amendment: 709/21.

PRESERVATION OF RIGHTS IN PENDING LITIGATION

RULE 40 INTERLOCUTORY INJUNCTION OR MANDATORY ORDER

How Obtained

40.01 An interlocutory injunction or mandatory order under section 101 or 102 of the Courts of Justice Act may be obtained on motion to a judge by a party to a pending or intended proceeding. R.R.O. 1990, Reg. 194, r. 40.01.

Where Motion Made without Notice

Maximum Duration

40.02 (1) An interlocutory injunction or mandatory order may be granted on motion without notice for a period not exceeding ten days. R.R.O. 1990, Reg. 194, r. 40.02 (1).

Extension

(2) Where an interlocutory injunction or mandatory order is granted on a motion without notice, a motion to extend the injunction or mandatory order may be made only on notice to every party affected by the order, unless the judge is satisfied that because a party has been evading service or because there are other exceptional circumstances, the injunction or mandatory order ought to be extended without notice to the party. R.R.O. 1990, Reg. 194, r. 40.02 (2).

(3) An extension may be granted on a motion without notice for a further period not exceeding ten days. R.R.O. 1990, Reg. 194, r. 40.02 (3).

Labour Injunctions Excepted

(4) Subrules (1) to (3) do not apply to a motion for an injunction in a labour dispute under section 102 of the Courts of Justice Act. R.R.O. 1990, Reg. 194, r. 40.02 (4).

Court File No. CV-22-00088514-00CP

ZEXI LI

- and -

CHRIS BARBER, BENJAMIN
DICTER, TAMARA LICH, PATRICK KING and
JOHN DOES 1-60

Plaintiff (Moving Party)

Defendants (Responding Parties)

ONTARIO
SUPERIOR COURT OF JUSTICE

FACTUM OF THE MOVING PARTY
(Motion returnable February 16, 2022)

CHAMP & ASSOCIATES
Equity Chambers
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Ottawa, ON K2P 0W6
Tel.: (613) 237-4740
Fax.: (613) 232-2680

Per: Paul Champ
LSUC#: 45305K
Email: pchamp@champlaw.ca

Solicitors for the Plaintiff

ZEXI LI

- and -

**CHRIS BARBER, BENJAMIN
DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOES 1-60**

Plaintiff (Moving Party)

Defendants (Responding Parties)

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**MOTION RECORD
Motion for Interlocutory Injunction
(Motion returnable February 16, 2022)**

CHAMP & ASSOCIATES
Equity Chambers
43 Florence Street
Ottawa, ON K2P 0W6
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Fax.: (613) 232-2680

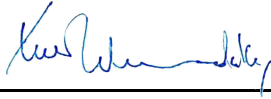
Per: Paul Champ
LSUC#: 45305K
Email: pchamp@champlaw.ca

Solicitors for the Plaintiff

This is Exhibit "TTTTT" mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

CITATION: Li et al. v. Barber et. al., 2022 ONSC 1176

COURT FILE NO.: CV-22-88514-CP

DATE: 2022/02/22

SUPERIOR COURT OF JUSTICE – ONTARIO

Proceeding under the Class Proceedings Act, 1992

RE: ZEXI LI, HAPPY GOAT COFFEE COMPANY INC,
7983794 CANADA INC. (c.o.b. as UNION: LOCAL 613)
and GEOFFREY DEVANEY, Plaintiffs

AND:

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING,
JAMES BAUDER, BRIGITTE BELTON, DANIEL BULFORD, DALE ENNS,
CHAD EROS, CHRIS GARRAH, MIRANDA GASIOR, JOE JANSEN,
JASON LAFACE, TOM MARAZZO, RYAN MIHILEWICZ, SEAN TIESSEN,
NICHOLAS ST. LOUIS (a.k.a. @NOBODYCARIBOU),
FREEDOM 2022 HUMAN RIGHTS AND FREEDOMS,
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10,
JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15,
JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20,
JOHN DOE 21, JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25,
JOHN DOE 26, JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30,
JOHN DOE 31, JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35,
JOHN DOE 36, JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40,
JOHN DOE 41, JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45,
JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50,
JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55,
JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59, JOHN DOE 60,
JANE DOE 1 and JANE DOE 2, Defendants

BEFORE: Regional Senior Justice Calum MacLeod

COUNSEL: Monique J. Jilesen, Madison Robins, Sarah Bittman and Jessica Kras, as agents
for Paul Champ, Counsel, for the Plaintiff

HEARD: February 17, 2022

REASONS FOR DECISION

Introduction

[1] This is a proposed class proceeding brought by citizens of Ottawa against organizers, supporters and participants in the “Freedom Convoy” which has blockaded downtown Ottawa for over three weeks. The plaintiffs seek compensation for damages inflicted upon those who live, carry on business or work in the downtown core. It is a civil claim based on the torts of private and public nuisance. It is therefore a lawsuit between private parties and should be distinguished from any criminal, regulatory or government action that may also be underway.

[2] The motion before the court on February 17, 2022 was brought without notice to the defendants because the plaintiffs alleged that the defendants were taking steps to move or dissipate assets and if they were aware of the proposed injunction, they would take steps to defeat it. In legal terms, it was a motion for an *ex parte* Mareva Injunction. In plain English, a motion brought without warning to freeze assets of the defendants to prevent them from disappearing.

[3] *Ex parte* means without notice. It stands in stark contrast with another Latin phrase that was recently in the news, *audi alterem partem*. The latter is a fundamental principle of justice. It means that no decision should be made without all parties being heard. It is a central tenet of our legal system. As such, although motions without notice are sometimes necessary and justified, any such order is made on a temporary basis pending a hearing of all sides of the issue. Pursuant to Rule 40.02 of the *Rules of Civil Procedure*, an injunction granted without notice is for a maximum of ten days. When the motion returns, the opposing parties must be put on notice and will have an opportunity to oppose the order or the continuation of the injunction.

[4] Despite these safeguards, the court will not make this type of order lightly. There are stringent tests for injunctions with or without notice. The bar for an order of this type obtained without notice is higher still.

[5] At the conclusion of the hearing on February 17, I was persuaded by the evidence and by the submissions of counsel that this was a case justifying the requested injunction. I signed the order with reasons to follow. The order will expire on February 28 if it is not renewed or extended after a hearing on notice.

[6] My reasons for granting the order are set out below.

The test for a Mareva Injunction

[7] An interlocutory injunction or a mandatory order may be made in the course of a lawsuit in advance of judgment where it is necessary in the interests of justice. Section 101 of the *Courts of Justice Act*, states that such an order may be made “where it appears to a judge of the court to be just or convenient to do so”. The usual basis for such an order is to prevent a party from continuing to inflict damage on the other or to preserve the rights of the parties in the pending litigation.

[8] An interlocutory injunction is an equitable remedy that is ordinarily appropriate if there is a genuine issue to be tried, the moving party may suffer irreparable harm if the order is not granted and the balance of convenience favours the granting of the order. For a Mareva injunction, however, there is a higher test. The plaintiff must show he or she has an apparently strong case

against the defendant, that the defendant has assets in the jurisdiction and there is a serious risk the defendant will dissipate those assets or remove them from the jurisdiction if the order is not granted.¹

Analysis

[9] The so called occupation of downtown Ottawa by the self declared “Freedom Convoy” has attracted worldwide attention. The participants in the protest are well organized and well funded. Apart from their declared opposition to COVID restrictions imposed by all levels of government, the participants have been presenting challenges to law enforcement and they have imposed significant negative impact on residents and businesses in the downtown core. Residents say they have endured days of impassible streets, constant noise, idling truck engines and obscenities. There have been allegations of racism, white supremacy, desecration of monuments, implied threats of violence and harassment of citizens who wear masks or otherwise attempt to comply with the current COVID restrictions.

[10] For purposes of this motion, I need not determine the point at which the right to freedom of speech and expression collides with the rights of other citizens such as to render the activity illegal. I need not determine the point at which a lawful assembly becomes unlawful. I need not determine if the continued blockage of the streets by large commercial vehicles is encompassed in the right to freedom of expression or is instead a form of illegal weaponization of a highly regulated vehicle. Suffice to say that lawful acts do not provide cover to break other laws with impunity and an otherwise lawful act becomes unlawful and criminal if it is carried on in defiance of a lawful order prohibiting it. These are issues for other court proceedings on other days. The only question on this motion is whether the injunction should be granted within the context of this litigation.

[11] As discussed in the introduction, this is a civil action for damages based upon the torts of private and public nuisance. The law of tort permits a private right of action whenever an individual suffers damage due to activities of another individual which are actionable. Under the law of nuisance, the common law imposes liability against a tortfeasor (defendant) when the activities of a defendant unreasonably and substantially interfere with the plaintiff’s occupation or enjoyment of land. In tort law, it is the impact on the plaintiff and not the intent of the defendant which makes it actionable.

[12] The legal question in a nuisance action is whether the interference is substantial and unreasonable. It is important to understand that although the question of whether the defendant’s activity is lawful or illegal factors into the question of whether the interference is reasonable, it is not determinative. Even lawful activity may be tortious measured against this standard.² Even if the defendants are ultimately found to be lawfully exercising constitutional rights of protest and

¹ See *O2 Electronics Inc. v. Sualim*, 2014 ONSC 5050. The leading appellate decision in Ontario remains *Chitel v. Rothbert*, 1982 CanLII 1956, 39 O.R. (2d) 513 (C.A.) The leading Supreme Court decision is *Aetna Financial Services Ltd. v. Feigelman*, [1985] 1 SCR 2

² See *Antrim Truck Centre Ltd. v. Ontario (Transportation)*, 2013 SCC 13, [2013] 1 SCR 594 and *St. Lawrence Cement v. Barrette*, [2008] 3 SCR 392

dissent, it does not follow that in the exercise of those rights they do not have responsibilities to their fellow citizens. Under our system of law, citizens have legal rights, but they also have legal responsibilities. Perfectly lawful acts which cannot result in fines or imprisonment, may nevertheless result in liability to those who are intentionally or inadvertently injured as a result. Civil liability is not the same thing as “guilt” under criminal or regulatory law.

[13] The tort of public nuisance is somewhat similar to private nuisance, but it is not concerned with occupation or enjoyment of property. It is public nuisance to unlawfully interfere with the right of the public to use and enjoy public areas such as streets and sidewalks. It may be public nuisance to interfere with the rights of the public at large without legal authorization. Public nuisance is a tort that focuses on damages sustained by members of the public when they are denied their right to enjoyment of the common spaces and public thoroughfares. Again, what makes it actionable is not the intent of the defendant, but the impact on the plaintiffs and the significance of the interference with the plaintiff’s own rights. We are concerned here with the private right to sue and not the steps taken by police or government authorities.

[14] There can be little argument that based on the statement of claim, the plaintiffs have endured a substantial interference with their rights. The disruption has now continued for more than three weeks. The resident class claims to have endured constant and significant interference with the activities of daily living. The business class claims to have endured interference with the ability to carry on business so that they have had to close or limit the business and suffered loss of revenue. The employee class claims to have suffered loss or reduction of employment and loss of income. On the facts disclosed by the affidavits, there is an apparently strong case for establishing tort liability.

[15] A more difficult question is whether the plaintiffs have a claim against the funds they are attempting to freeze. Just because a fund was created to support the protest does not necessarily mean that a judgment against an individual defendant would attach to that fund. Fundraising law is complex. People who start a fundraiser may have a duty to the donors. Funds raised from the public may be impressed with a trust or in some cases may fall under the jurisdiction of the Public Guardian and Trustee. Suffice to say that a crowdsourcing fund held by a fundraising platform is probably not the property of the intended beneficiaries until the funds are released. It would be difficult to argue that such a fund would fall within the ambit of a Mareva injunction.

[16] The pertinent question for this motion is whether the funds the plaintiff seeks to enjoin are now owned or controlled by the defendants who are the target of the injunction and not whether the fundraisers owe obligations to donors or others. It is fundamental to the granting of a Mareva injunction that the defendants are attempting to dissipate funds to which a judgment might attach.

[17] A fundraising platform which controls the funds and acts like a granting agency might have the power to grant or withhold funds in its own discretion. An example of this occurred earlier in February. The protestors had originally raised a considerable sum of money through a GoFundMe campaign. At a certain point GoFundMe concluded that, in its view, the original peaceful protest had mutated into something more sinister and unlawful which was a violation of its terms of

service. It froze the funds and returned them to the donors. Evidently, in that case, the ownership of the asset had not passed to the defendants.

[18] The situation is different if the funds are in the hands of the defendants and no longer controlled by either the original donors or the fundraising platform. In that case the gift has vested.³

[19] I am satisfied by the evidence that the funds, whether they are in the form of currency or cryptocurrency, are now legally in the possession, power and control of the defendants who are the target of the motion (referred to in the motion material as the “Mareva Defendants”).

[20] I am also satisfied that the organizers of the protest and the Mareva Defendants have purposely arranged the control of the funds in this manner to avoid another scenario such as the GoFundMe situation. The funds have been purposely placed outside of the control of any fundraising platform. Moreover, the Mareva Defendants have been promoting the use of cryptocurrency such as bitcoin under the mistaken belief that it is untraceable and cannot be seized by a court or other legal authority.

[21] This is not the place for a detailed exploration of the nature of bitcoin or other cryptocurrencies. In summary, however, cryptocurrency is a web based currency that is not denominated in traditional legal tender. Traditional legal currency exists either as specie (banknotes or coins) which can be carried in a physical wallet or stored in a physical location but generally is stored by depositing it with a financial institution like a bank. There the funds exist not as bundles of money in a vault or a box, but as a ledger entry which records a debt by the financial institution to the client. In the modern age, those ledgers are all electronic, stored on computer databases. In that sense, we already live in an age of digital currency, but it is currency denominated in legal tender (state backed or “fiat” currency) such as Canadian dollars.

[22] Cryptocurrency, by contrast, is not stored in a financial institution. Bitcoin, for example, is a digital token stored on what is called an “online distributed ledger system” or blockchain. According to the expert affidavit, the defining characteristic of a blockchain is that it is an online distributed database (meaning it is stored in the “cloud” diffused over many computers or storage devices) and contains information about transactions that occur on it. A blockchain is what identifies ownership and records transactions that occur in a given cryptocurrency such as bitcoin. The person with the key (essentially the password) controls the blockchain and may be anonymous but it is an essential characteristic of the digital ledger that it can be viewed and verified. Digital transactions are therefore visible and recorded and are anonymous only to the extent that the keyholder is unknown. In fact, bitcoin transactions are all part of a public ledger that can be viewed by anyone.

[23] Digital funds are not immune from execution and seizure to satisfy a debt any more than a bank account provided the individual or institution which can access the funds are within the reach

³ See *McNamee v. McNamee*, 2011 ONCA 533, 106 OR (3d) 401

of a court order. Digital wallets may be self controlled, but more commonly are part of a service provided by a provider and accessed through an application or software in a similar manner to online banking. Cryptocurrency exchanges are used to convert bitcoin or other currencies to fiat currency. Many of these digital institutions are within the jurisdiction of the court or are located in jurisdictions where Ontario judgments and orders may be enforced. The defendants of course are themselves subject to the jurisdiction of the court because they are present in Ontario and they may be enjoined from cashing or transferring assets including cryptocurrency.

[24] In this case, the plaintiff has clear evidence that certain of the defendants are the owners of digital wallets storing significant funds that have been amassed in bitcoin or other digital currencies. The expert investigator has been monitoring activity in these wallets and provided evidence about the steps that have been taken to break up, move and distribute those funds. In addition to the visible activity in the digital wallets, there is also considerable evidence about the plans to distribute the funds as soon as possible in part to benefit the individual protestors but also to avoid any enforcement activity. This is seen in the defendants' own communications to their supporters on social media and elsewhere. The key point for this motion is that certain of the Mareva Defendants have ownership and control of the digital wallets and they are poised to distribute or dissipate those funds.

[25] It is also relevant that the fresh as amended claim names individuals and entities that have knowingly funded or supported the continuation of tortious activity as added defendants. In particular, certain of the Mareva Defendants are entities created for the purpose of collecting funds and using them to support the impugned activities. If those entities are liable to the plaintiffs, then their property would be exigible if and when a judgment is granted.

[26] The evidence also satisfies me that distribution of the funds is imminent or is underway and is for the very purpose of dissipating the fund so that it cannot be frozen or seized. At least at this preliminary stage, I am therefore persuaded that the test for this kind of injunction has been met.

[27] I did question counsel about whether an injunction was necessary in light of the other measures that are in place. I also challenged the plaintiffs to demonstrate that the injunction they seek is for a proper purpose. That is to preserve an asset to which the plaintiff (or the plaintiff class) may have a claim rather than to interdict the flow of funds which is the rationale behind a restraint order granted earlier this month or the new emergency regulations brought in by the Government of Canada. I was satisfied that the various orders would not be working at cross purposes and they seek to achieve different objectives.

[28] It is worth reviewing the other injunctions and orders to which I am referring. It is evident from that review that none of those other orders are aimed at ensuring a judgment is enforceable.

[29] On February 4, 2022, the plaintiff Zexi Li commenced this proposed class proceeding and on February 7, 2022, Ms. Li was successful in obtaining an interim injunction from my colleague, Justice Hugh McLean. Justice McLean ordered an end to the honking of horns, sounding of truck horns or train horns or air horns. While counsel for three of the named defendants appeared to

oppose the granting of the injunction, he did not oppose the extension of the order when it came back before the court yesterday. To some degree at least, that injunction has been respected and after the order was granted, the noise level dropped considerably although in other respects the disruption continued.

[30] Other injunctions or similar orders have been obtained in separate proceedings.

[31] On February 10, 2022, at the request of the Attorney General of Ontario, the court made an *ex parte* “restraint order” pursuant to s. 490.8 of the *Criminal Code of Canada* freezing and restraining distribution of funds raised through the American online funding platform, GiveSendGo.⁴ That section of the *Code* permits the court to freeze assets that appear to be used in the commission of a serious criminal offence. Associate Chief Justice McWatt was persuaded that there was sufficient evidence of criminal activity to make the requested order.

[32] On February 14, 2022, on application by the City of Ottawa against persons unknown, the court issued an injunction restraining ongoing breaches of municipal by-laws. Those by-laws related to open fires, idling of vehicles, parking violations and noise. That matter was also heard by the Associate Chief Justice. It was clear that there were ongoing violations of the municipal by-laws and the City was entitled to a restraining order pursuant to s. 440 of the *Municipal Act*. While the injunction was obtained by counsel retained by the City, counsel for the Attorney General of Ontario and Attorney General of Canada appeared and were granted intervenor status.⁵ The injunction was granted. It does not appear it has yet been enforced.

[33] On February 15, 2022, by Order-in-Council, the Government of Canada declared a Public Order Emergency pursuant to the *Emergency Act*. At the same time, pursuant to the legislation and the declaration, a number of executive orders were made. Besides prohibiting the current public assembly and restricting use of property to support or further the disruption thereby declared unlawful, the orders including an “Emergency Economic Measures Order”. That order makes it illegal amongst other things for any person to provide any property including currency or virtual currency to or for the benefit of participants in the current disruption in Ottawa.

[34] Those latter two orders obtained by the Crown or made by the Government of Canada restrain, in a general way, the use of funds for purposes of promoting criminal and unlawful behaviour. The current motion, by contrast, is a motion by plaintiffs in a civil action to freeze specific assets in order to preserve a fund against which they may be able to execute if they obtain a civil judgment for damages.

[35] I was also concerned about overreach. Because the plaintiffs do not have details of what funds are contained in the bank accounts of individual defendants, the draft order contains a freeze over all of their bank accounts. This tracks the wording of the “model order” in use in Ontario for Mareva injunctions. It is necessary because the plaintiff, at this stage, cannot be more specific.

⁴ Counsel for the Attorney General - Randy Schwartz, Director, Crown Law Office – Criminal

⁵ Counsel for the City, Kevin Nearing & Michelle Doody, counsel for the AG Ontario Padraic Ryan & Waleed Malik, (Constitutional Law Branch), counsel for the AG Canada, Andrew Gibbs & Catherine Lawrence, DOJ.

The model order contains language to allow a defendant caught by the order to seek relief so that mortgages and expenses of daily living can be paid and also requires the defendants to disclose what funds are in their accounts. I added language to permit the release of funds by written agreement with the plaintiff in order that this can be achieved quickly and without waiting for a court order. Ultimately, however, I was persuaded that if the order was to have its desired effect, an immediate freeze is necessary. This can be modified if and when the injunction is renewed and it will cease to apply if the injunction expires or is lifted.

[36] Given the evidence of active steps to dissipate the funds, I concluded that a Mareva injunction should be granted without first warning the defendants. As discussed earlier, that is drastic relief which can only be granted until the defendants are put on notice and have an opportunity to be heard.

Undertaking for Damages

[37] It is typically the case that a party who obtains an injunction in advance of judgment runs the risk that however strong their case may appear at the time of the injunction; they may be unsuccessful at trial. In that case the party who obtains the injunction may be liable in damages for what is ultimately shown to be an unjustified injunction. Ordinarily, the party seeking an injunction must give an undertaking to pay such damages as a condition of obtaining the order.

[38] In this case I was asked to waive the requirement for an undertaking. The court has the discretion to waive the requirement under Rule 40.03. There is authority that it is appropriate to waive the undertaking in cases which have broad public interest significance, or which are cases involving human rights.⁶ There is also authority that such an undertaking should not be required from a representative plaintiff acting for the benefit of a class.⁷ Under the circumstances of this case, I did not require such an undertaking as a condition of the order. I exercise my discretion pursuant to Rule 40.03 to waive the requirement.

The Amended Pleading

[39] I will just say a quick word about the pleading amendment because that was also the subject of an *ex parte* court order. Unlike the injunction, however, a pleading amendment at this stage in a proposed class action is not extraordinary relief but is routine. For transparency, I will explain.

[40] The original statement of claim only proposed one class of plaintiffs and named only Ms. Li as a representative plaintiff. The fresh as amended statement of claim not only expands the proposed classes to include businesses and employees, but also adds additional defendants quite apart from the numerous unidentified “John Doe” defendants.

[41] The plaintiff had prepared a draft “fresh as amended statement of claim” and had publicly announced that the class action was being expanded. The new pleading formed part of the motion

⁶ See *Cardinal v. Cleveland Indians Baseball Company Limited Partnership*, 2016 ONSC 6929

⁷ See *Tracy v. Instalogs Financial Solutions Centres (B.C.) Ltd.*, 2006 BCSC 1018; *aff’d* in part, 2007 BCCA 481

materials but had not been formally issued. I was of the view that it was appropriate to deal with the proposed amendments before dealing with the motion for the injunction because otherwise the draft pleading would not have been approved by the court and might be subject to change.

[42] A motion to amend a pleading to add parties before anyone has defended the original action may be entertained without notice for the simple reason that the plaintiff could start a separate proceeding at any time before the expiry of a limitation period without notifying anyone. Defendants are not entitled to be told ahead of time that they are about to be sued.

[43] Pursuant to Rule 26.02, a plaintiff may amend a pleading without leave at anytime before pleadings are closed. Addition of parties, however, does require leave of the court under Rule 5.04 (2). Pursuant to that rule, leave will be granted if it does not result in prejudice that could not be addressed in costs or an adjournment. There is no prejudice in this case because the action is in its infancy and as mentioned, a separate proceeding could be started in any event. There is no benefit to having two parallel proceedings. The action has not been defended and the majority of the defendants have yet to be served (or even identified).

[44] The amendments add additional plaintiffs and propose additional classes. In addition to the class of residents, there will now be a class of businesses that were disrupted and employees of business whose employment was disrupted. In addition to damages for nuisance caused by noise, the claim now also seeks damages for other forms of nuisance such as air pollution from numerous idling diesel engines and tortious interference with the right to carry on business.

[45] To be clear, the class proceeding has not yet been certified as such. Consideration as to whether or not a class proceeding is appropriate will take place in due course at a motion under s. 5 of the *Class Proceedings Act*.⁸ As soon as possible, I will designate a case management judge from the class proceedings team who will set a timetable and a date for the certification motion. We are not at that stage.

[46] It is important to note, however, that whether or not certification is granted, the named plaintiffs have individual rights to sue on their own behalf and to seek interim remedies such as an injunction.

Summary and Conclusion

[47] For the reasons discussed above, I signed two orders. The first was the pleading amendment order. The second was the temporary Mareva injunction.

[48] In addition to serving the orders on the parties affected, counsel for the plaintiffs will have to provide notice of a motion to extend the injunction if they propose to do so. I have made time available for that purpose on the morning of February 28, which is the day the temporary injunction will otherwise expire.

⁸ *Class Proceedings Act*, 1992, S.O. 1992, c. 6 as amended to December 8, 2021 (the “Act”)

[49] As I have been at pains to be clear, the class proceeding has nothing to do with any of the regulatory or criminal proceedings that are underway or may result from the actions of the protestors. Nevertheless, in light of the extraordinary public interest in this matter and the overlapping orders I have mentioned above, there is the possibility that the Mareva injunction could impact one or more of those other proceedings.

[50] Under the circumstances, it would be appropriate to put the Attorney General of Ontario and the Attorney General of Canada on notice in case they are of the view that this injunction clashes with other proceedings. I understand the Canadian Civil Liberties Association has also launched a challenge to the declaration of the *Emergencies Act* and while an injunction such as this engages different considerations, counsel for the CCLA should also be given notice.

[51] To be clear, I am not inviting anyone to intervene in the injunction motion, but I want to ensure they are aware of the hearing.

Mr. Justice C. MacLeod

Date: February 22, 2022

CITATION: Li et al. v. Barber et. al., 2022 ONSC 1176
COURT FILE NO.: CV-22-88514-CP
DATE: 2022/02/22

ONTARIO

SUPERIOR COURT OF JUSTICE

RE: ZEXI LI, HAPPY GOAT COFFEE
COMPANY INC, 7983794
CANADA INC. (c.o.b. as
UNION: LOCAL 613) and
GEOFFREY DEVANEY, Plaintiffs

AND:

CHRIS BARBER, BENJAMIN
DICTER, TAMARA LICH,
PATRICK KING, JAMES BAUDER,
BRIGITTE BELTON, DANIEL
BULFORD, DALE ENNS, CHAD
EROS, CHRIS GARRAH, MIRANDA
GASIOR, JOE JANSEN, JASON
LAFACE, TOM MARAZZO, RYAN
MIHILEWICZ, SEAN TIESSEN,
NICHOLAS ST. LOUIS (a.k.a.
@NOBODYCARIBOU),
FREEDOM 2022 HUMAN RIGHTS
AND FREEDOMS, JOHN DOE 1,
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BEFORE: Regional Senior Justice Calum MacLeod

COUNSEL: Monique J. Jilesen, Madison Robins, Sarah Bittman and Jessica Kras, as agents for Paul Champ, Counsel, for the Plaintiff

REASONS FOR DECISION

Regional Senior. Justice C. MacLeod

Released: February 22, 2022

This is Exhibit “UUUUU” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this **4th** day of

April, 20**22**.

A handwritten signature in blue ink, appearing to read "Nur Muhammed-Ally", is written over a horizontal line.

A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

CITATION: Li et al. v. Barber et. al., 2022 ONSC 1351
COURT FILE NO.: CV-22-88514-CP
DATE: 2022/02/28

SUPERIOR COURT OF JUSTICE – ONTARIO
Proceeding under the Class Proceedings Act, 1992

RE: ZEXI LI, HAPPY GOAT COFFEE COMPANY INC, 7983794 CANADA INC.
(c.o.b. as UNION: LOCAL 613) and GEOFFREY DEVANEY, Plaintiffs

AND:

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING,
JAMES BAUDER, BRIGITTE BELTON, DANIEL BULFORD, DALE ENNS,
CHAD EROS, CHRIS GARRAH, MIRANDA GASIOR, JOE JANSEN, JASON
LAFACE, TOM MARAZZO, RYAN MIHILEWICZ, SEAN TIESSEN,
NICHOLAS ST. LOUIS (a.k.a. @NOBODYCARIBOU), FREEDOM 2022
HUMAN RIGHTS AND FREEDOMS, JOHN DOE 1, JOHN DOE 2, JOHN
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58, JOHN DOE 59, JOHN DOE 60, JANE DOE 1 and JANE DOE 2, Defendants

BEFORE: Regional Senior Justice Calum MacLeod

COUNSEL: Monique J. Jilesen, & Paul Champ, for the Plaintiffs

Norman Groot, for the Mareva defendants Dichter, Lich, Garrah, St. Louis and
Freedom 2022 Human Rights and Freedoms

Geoff Hall & Leah Ostler for the Toronto Dominion Bank

Melissa Adams, for the Attorney General of Ontario

HEARD: February 28, 2022

ENDORSEMENT

[1] On February 17, 2022, I granted an *ex parte* Mareva injunction. Reasons were released on February 22, 2022. (2022 ONSC 1176). As set out in that decision, the purpose of a Mareva injunction is to restrain the dissipation of assets to which a plaintiff may have a claim. A motion without notice is justified only if it appears that such dissipation of assets is imminent. Such an order can only be made on a temporary basis until the parties that are affected have an opportunity to respond and to be heard.

[2] The injunction was scheduled to expire today unless it was renewed. The plaintiffs brought the necessary motion for such an extension. In response, affidavits were filed by Tamara Lich and four individuals who live in downtown Ottawa and/or attended and supported the Freedom Convoy events in downtown Ottawa (Messrs. Gagne, Bulford, McKinney & Renaud).

[3] Affidavits were also sworn by an investigator (Daina Slenys) and by Mr. Dichter, Mr. Garrah and Mr. St. Louis. The latter were in support of a proposal to transfer funds held by each of those parties to an escrow fund as a term of adjourning the motion. That proposal was put forward by Mr. Groot who has been retained by the Mareva defendants except for Patrick King (who is currently in custody and did not appear today). This resulted in agreement to a brief extension of the order with slightly modified terms and to postponing certain disclosure and examinations under oath contemplated by the original order.

[4] Mr. Bobby Kofman, President of the proposed escrow agent attended to advise that the terms of the proposed order were satisfactory and KSV Advisory Inc. is prepared to act as escrow agent.

[5] Counsel for the Attorney General of Ontario appeared to advise that the Attorney General has no objection to the transfer of these funds to an escrow agent. The funds in question do not appear to be funds subject to the Restraint Order granted by Associate Chief Justice McWatt pursuant to the *Criminal Code* but in any event will be held by the escrow agent until further order of the court.

[6] Counsel for the TD Bank appeared because the bank holds certain funds that may be caught by either the restraint order or the Mareva injunction or both. The Bank intends to bring an interpleader motion to pay those funds into court. Counsel for the Bank does not oppose the order sought today.

[7] There was some discussion about whether the plaintiff would be required to bring a new motion on the return date. I agree with counsel for the plaintiff that it is not necessary to do so. I can adjourn the motion before the court today to the new return date on terms. Those terms are the temporary extension and modification of the Mareva injunction as set out in the consent order. The motion will therefore be adjourned until March 9, 2022, at 2:00 p.m. It will continue as a virtual hearing on the Zoom videoconference platform.

[8] I reiterate that this court proceeding is concerned with potential civil liability for the organizers, funders and participants in the Freedom Convoy to residents, businesses and employees in central Ottawa who were adversely affected. It is independent and separate from any of the criminal processes that may be underway.

[9] The injunction is concerned with preservation of assets that may be available to provide compensation if compensation is ultimately ordered.

[10] I will reserve further comment until the motion returns before the court on March 9.

[11] **This court therefore orders and directs as follows:**

- a. This motion is adjourned to March 9, 2022, at 2:00 p.m. to continue by way of videoconference on the Zoom platform provided by the court.
- b. On consent, and without prejudice to the rights of the parties, the Mareva injunction is extended and varied as set out in the formal order signed by me today.
- c. Costs of today, if any, are reserved to the hearing of the motion.

Mr. Justice C. MacLeod

Date: February 28, 2022

CITATION: Li et al. v. Barber et. al., 2022 ONSC 1351
COURT FILE NO.: CV-22-88514-CP
DATE: 2022/02/28

ONTARIO

SUPERIOR COURT OF JUSTICE

RE: ZEXI LI, HAPPY GOAT COFFEE
COMPANY INC, 7983794
CANADA INC. (c.o.b. as
UNION: LOCAL 613) and
GEOFFREY DEVANEY, Plaintiffs

AND:

CHRIS BARBER, BENJAMIN
DICTER, TAMARA LICH,
PATRICK KING, JAMES BAUDER,
BRIGITTE BELTON, DANIEL
BULFORD, DALE ENNS, CHAD
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MIHILEWICZ, SEAN TIESSEN,
NICHOLAS ST. LOUIS (a.k.a.
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55, JOHN DOE 56, JOHN DOE 57,
JOHN DOE 58, JOHN DOE 59, JOHN
DOE 60, JANE DOE 1 and JANE DOE
2, Defendants

BEFORE: Regional Senior Justice Calum MacLeod

COUNSEL: Monique J. Jilesen, & Paul Champ, for
the Plaintiffs

Norman Groot, for the Mareva
defendants Dichter, Lich, Garrah, St.
Louis and Freedom 2022 Human Rights
and Freedoms

Geoff Hall & Leah Ostler for the Toronto
Dominion Bank

Melissa Adams, for the Attorney General
of Ontario

ENDORSEMENT

Regional Senior. Justice C. MacLeod

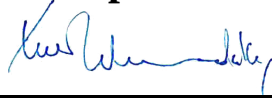
Released: February 28, 2022

This is Exhibit “VVVVV” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this **4th** day of

April, 20**22**.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

CITATION: Li et al. v. Barber et. al., 2022 ONSC 1543
COURT FILE NO.: CV-22-88514-CP
DATE: 2022/03/10

SUPERIOR COURT OF JUSTICE – ONTARIO
Proceeding under the Class Proceedings Act, 1992

RE: ZEXI LI, HAPPY GOAT COFFEE COMPANY INC, 7983794 CANADA INC.
(c.o.b. as UNION: LOCAL 613) and GEOFFREY DEVANEY, Plaintiffs

AND:

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING,
JAMES BAUDER, BRIGITTE BELTON, DANIEL BULFORD, DALE ENNS,
CHAD EROS, CHRIS GARRAH, MIRANDA GASIOR, JOE JANSEN, JASON
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NICHOLAS ST. LOUIS (a.k.a. @NOBODYCARIBOU), FREEDOM 2022
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58, JOHN DOE 59, JOHN DOE 60, JANE DOE 1 and JANE DOE 2, Defendants

BEFORE: Regional Senior Justice Calum MacLeod

COUNSEL: Monique J. Jilesen, & Paul Champ, for the Plaintiffs

Norman Groot, for the Mareva defendants Dichter, Lich, Garrah, St. Louis and
Freedom 2022 Human Rights and Freedoms

Geoff Hall & Leah Ostler for the Toronto Dominion Bank

Melissa Adams, for the Attorney General of Ontario (Crown Law Office
Criminal)

Susan Keenan, for the Attorney General of Ontario (Crown Law Office Civil)

Jacob Wells (in person) for GiveSendGo LLC

HEARD: March 9, 2022

ENDORSEMENT

[1] On February 17, 2022, I granted an *ex parte* Mareva injunction. Reasons were released on February 22, 2022 (2022 ONSC 1176). On February 28, 2022, I heard a motion to extend the Mareva Injunction which was adjourned to today on terms (2022 ONSC 1351).

[2] The terms of the adjournment included an extension and modification of the order, the establishment of an escrow fund and transfer of certain assets to the Escrow Agent. The escrow fund was proposed by certain of the Mareva defendants and had the intended effect of putting the funds in question under court control pending further determination.

Matters Before the Court

[3] The motion to extend the Mareva injunction was returnable today. I was also asked to deal with the following motions:

- a. A motion by the plaintiffs to amend the fresh as amended statement of claim. The proposed amendments add the request for a Mareva Injunction to the prayer for relief and add particulars to the damages allegedly suffered by the proposed business class and employee class.
- b. A motion by the TD Bank to add funds held by the Bank to the funds held by the escrow agent (as an alternative to paying funds into court). This duplicates relief sought in an application brought on the Commercial List (Toronto Court File No. CV-22-676865-00CL) on February 14, 2022.
- c. A motion brought by the defendants to lift the Mareva Injunction in relation to certain of the defendants and to convert the order to a preservation order over the funds held by the escrow agent. The defendants also seek clarification and direction in relation to cryptocurrency seized by the police subsequent to my order of February 28, 2022 and relates in part to the restraint order granted by Associate Chief Justice McWatt in a proceeding brought by the Attorney General of Ontario under the *Criminal Code* (Ottawa Court file no. 22-13355MO) and they seek a modification of the restraint order.
- d. The defendants move to dissolve the Mareva Injunction or to set a date to argue the question. The defendants also seek costs against various parties.
- e. There is a request – although no formal motion – that the court direct GiveSendGo to transfer certain funds it is holding to the escrow agent.

f. The Royal Bank of Canada seeks direction to pay funds to the escrow agent.

[4] By way of preliminary comment, it is important that the proposed class proceeding not become a vehicle for omnibus motions dealing with various matters that are before the court in other forms and with different parties. There may well be virtue in having a single judge deal with related matters, but that does not mean the parties can ignore those other proceedings or act as if they have been consolidated. Where I have made orders dealing with other proceedings than the class proceeding currently before me, it is the duty of counsel to ensure the record in each of those proceedings is complete.

Extension of the Mareva Injunction

[5] The Mareva Defendants – at least those that are represented – intend to transfer all of the disputed funds and cryptocurrency in their possession or control to the Escrow Agent so that they need no longer be subject to the Mareva Injunction. This they propose to do without prejudice to their right to argue that the injunction should never have been granted or sought. In the meantime, I have extended the injunction subject to the modifications and clarifications the parties have agreed upon. I have given counsel until 4:00 tomorrow afternoon to settle the form of the order and scheduled a case conference to finalize it.

[6] I have further adjourned the motion to extend the injunction and the motion to dissolve the injunction to March 31, 2022, at 2:00 p.m.

Pleading Amendment Motion

[7] The motion to amend the pleading will be opposed by the Mareva Defendants. This is because the original pleading did not contain the request for injunctive relief. The defendants therefore argue that the proposed amendment in the face of their motion to dissolve the injunction is prejudicial. I have adjourned the pleading amendment motion to March 31 at 2:00 p.m. as well.

TD Interpleader Motion

[8] With respect to the TD interpleader motion, it is on consent, and it is an efficient use of court time to deal with it now. TD holds approximately \$1.3 million in funds deposited from funds raised by the Freedom Convoy Campaign. Those funds may, in part, be funds to which the Mareva injunction applies and, in part, may be funds captured by the Restraint Order. I note that the Restraint Order obtained by Ms. Adams on behalf of the Attorney General of Ontario is an order pursuant to the *Criminal Code* which seeks to freeze property that may have been used for a criminal purpose. This is not, in and of itself, a forfeiture proceeding.

[9] Ms. Keenan who also acts for the Attorney General, but on the civil side, advises that the Attorney General will be bringing forfeiture proceedings under the *Civil Remedies Act, 2001*. (S.O. 2001, c. 28). That proceeding has not yet been commenced, but the TD funds may be one of its targets.

[10] The Attorney General asks that a term of the interpleader order be that the Attorney General be given notice of any motion or other proceeding seeking to release these funds from escrow. I consider that reasonable, but I do not believe the Attorney General requires 30 days notice. 21 days notice should suffice.

[11] TD is prepared to discontinue the Commercial List application, but it will not be necessary to take that step. I communicated with the Toronto RSJ and the Team Lead for the Commercial List earlier today. The order will be granted pursuant to the notice of motion in the class proceedings action. The Commercial List application will be stayed.

Funds seized from Mr. St Louis by the police

[12] According to the affidavit of Mr. St. Louis, following the previous hearing, he was about to transfer cryptocurrency to the Escrow Agent when police officers operating under a search warrant raided his home and compelled him to surrender the cryptocurrency keys to the police.

[13] I am advised by counsel for the Attorney General that the police have now transferred the cryptocurrency keys to the Escrow Agent so that the order issued by this court will have been put into effect.

[14] The defendants take issue with the propriety of police seizing funds that were the subject of the court order shortly after a hearing at which counsel for the Attorney General was present. This may be an issue to be dealt with on a subsequent occasion as the defendant seeks costs against the Attorney General. No order appears necessary today.

Amendment to the Restraint Order

[15] Besides the TD funds mentioned above, there are funds held by the Royal Bank in accounts belonging to Mr. Garrah. Mr. Garrah acknowledges that one of those bank accounts was opened solely to collect funds or to receive funds from a fund-raising platform. He is prepared to release those funds to the Escrow Agent. Other funds in other bank accounts were not the target of the injunction.

[16] Counsel for the Attorney General agrees there should be a minor amendment to the Restraint Order granted by McWatt, ACJ. It appears that the amendment is on consent, I will grant it. I have communicated with the Associate Chief Justice and she has no objection to my dealing with the matter, but it will have to be an order made in the *Criminal Code* proceeding (which is an Ottawa file as shown above.)

Position of GiveSendGo LLC

[17] GiveSendGo LLC is a corporation with its head office in Delaware. It is a fund-raising platform. It is not a party to this proceeding. Mr. Wells appeared today as he was put on notice of the hearing by counsel for the Mareva Defendants.

[18] I am advised by Mr. Groot and by Mr. Wells that the defendant Freedom 2022 Human Rights and Freedoms was to have been a recipient of funds raised on the GiveSendGo platform, but it did not open a bank account to receive the funds prior to the granting of the injunction. As a consequence, the funds were never transferred. Mr. Wells advises that GiveSendGo is now returning those funds to the donors.

[19] Ms. Jilesen takes the position that GiveSendGo is in breach of the injunction by taking this step. Ms. Adams also takes the position that GiveSendGo is in breach of the restraint order.

[20] The question of a breach of the restraint order is not before the court today.

[21] As set out in my original reasons, the funds which the Mareva Injunction intended to preserve were funds that were, at the time, in the possession or control of the Mareva Defendants and therefore potentially exigible property if the plaintiffs are successful in this proceeding. I indicated that I did not view property that was held by a fund-raising platform and had not been distributed as falling within that class.

[22] Ms. Jilesen asked that I not rule definitively on that question today without the benefit of further affidavit material and a formal motion. In her submission, funds that were to have been distributed to Freedom 2022 as soon as it opened a bank account are its property and should fall into the class of assets to which the injunction attached. She argued that the question of whether GiveSendGo is in breach of the Mareva Injunction or whether Freedom 2022 is in breach by not taking the steps necessary to receive the funds should be questions for another day. I agree.

[23] There is no motion for contempt before the court and no motion to expand the scope of the injunction. If the plaintiffs wish to bring such motions for relief against either GiveSendGo or Freedom 2022, they may do so.

[24] For the moment, although Mr. Wells was present and is aware of the position of counsel for the plaintiffs (and counsel for the Attorney General) there is nothing for his company to formally respond to.

Summary & Conclusion

[25] The Mareva Injunction is extended with modifications and terms to be set out in an order which I will finalize tomorrow afternoon. The extension is until the end of the day on March 31, 2022.

[26] The motion to dissolve the injunction, the motion to extend the injunction and the motion to amend the statement of claim are adjourned to March 31, 2022, at 2:00 p.m.

[27] The interpleader motion brought by TD is granted with the provision for notice to the Attorney General. The Commercial List application is stayed.

[28] The Mareva defendants are to continue their efforts to comply with the modified order by moving funds and cryptocurrency to the Escrow Agent.

[29] If an amendment to the Restraint Order is necessary to deal with certain of the funds to be paid to the Escrow Agent, I will sign the necessary amending order.

[30] Costs of today, if any, are reserved to the return of the various motions mentioned above.

Regional Senior Justice C. MacLeod

Date: March 10, 2022

CITATION: Li et al. v. Barber et. al., 2022 ONSC 1543
COURT FILE NO.: CV-22-88514-CP
DATE: 2022/03/10

ONTARIO

SUPERIOR COURT OF JUSTICE

RE: ZEXI LI, HAPPY GOAT COFFEE
COMPANY INC, 7983794
CANADA INC. (c.o.b. as
UNION: LOCAL 613) and
GEOFFREY DEVANEY, Plaintiffs

AND:

CHRIS BARBER, BENJAMIN
DICHTER, TAMARA LICH,
PATRICK KING, JAMES BAUDER,
BRIGITTE BELTON, DANIEL
BULFORD, DALE ENNS, CHAD
EROS, CHRIS GARRAH, MIRANDA
GASIOR, JOE JANSEN, JASON
LAFACE, TOM MARAZZO, RYAN
MIHILEWICZ, SEAN TIESSEN,
NICHOLAS ST. LOUIS (a.k.a.
@NOBODYCARIBOU),
FREEDOM 2022 HUMAN RIGHTS
AND FREEDOMS, JOHN DOE 1,
JOHN DOE 2, JOHN DOE 3, JOHN
DOE 4, JOHN DOE 5, JOHN DOE 6,
JOHN DOE 7, JOHN DOE 8, JOHN
DOE 9, JOHN DOE 10, JOHN DOE 11,
JOHN DOE 12, JOHN DOE 13, JOHN
DOE 14, JOHN DOE 15, JOHN DOE
16, JOHN DOE 17, JOHN DOE 18,
JOHN DOE 19, JOHN DOE 20,
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25, JOHN DOE 26, JOHN DOE 27,
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32, JOHN DOE 33, JOHN DOE 34,
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39, JOHN DOE 40, JOHN DOE 41,
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DOE 44, JOHN DOE 45, JOHN DOE
46, JOHN DOE 47, JOHN DOE 48,
JOHN DOE 49, JOHN DOE 50,
JOHN DOE 51, JOHN DOE 52, JOHN
DOE 53, JOHN DOE 54, JOHN DOE
55, JOHN DOE 56, JOHN DOE 57,
JOHN DOE 58, JOHN DOE 59, JOHN
DOE 60, JANE DOE 1 and JANE DOE
2, Defendants

BEFORE: Regional Senior Justice Calum MacLeod

COUNSEL: Monique J. Jilesen, & Paul Champ, for
the Plaintiffs

Norman Groot, for the Mareva
defendants Dichter, Lich, Garrah, St.
Louis and Freedom 2022 Human Rights
and Freedoms

Geoff Hall & Leah Ostler for the Toronto
Dominion Bank

Melissa Adams, for the Attorney General
of Ontario

ENDORSEMENT

Regional Senior. Justice C. MacLeod

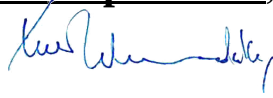
Released: March 10, 2022

This is Exhibit “WWWWW” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of

April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

CITATION: THE CORPORATION OF THE CITY OF WINDSOR v. PERSONS
UNKNOWN, 2022 ONSC 1168
COURT FILE NO.: CV-22-00030791-0000
DATE: 2022-02-22

SUPERIOR COURT OF JUSTICE - ONTARIO

RE: THE CORPORATION OF THE CITY OF WINDSOR

Applicant

AND:

PERSONS UNKNOWN

Respondents

AND

ATTORNEY GENERAL OF ONTARIO and AUTOMOTIVE PARTS
MANUFACTURERS' ASSOCIATION

Intervening Parties

AND:

THE DEMOCRACY FUND

Intervener as a Friend of the Court

BEFORE: Chief Justice G.B. Morawetz

COUNSEL: *Jennifer King, Michael Finley, Bevin Shores and Annamaria Enenajor*, for the
Applicant, the Corporation of the City of Windsor

Michael A. Wills and Darwin E. Harasym, for the Intervener, the Automotive Parts
Manufacturers' Association

Joshua Hunter and Padraic Ryan, for the Intervener, the Attorney General of
Ontario

Alan Honner, for the Intervener, The Democracy Fund

Antoine d'Ailly and James Kitchen, for Citizens for Freedom

HEARD and DETERMINED: February 18, 2022

REASONS RELEASED: February 22, 2022

ENDORSEMENT

[1] At the conclusion of the hearing on February 18, 2022, the record was endorsed as follows:

[1] The Application brought by the City of Windsor is granted.

[2] Two orders will issue today.

[3] The first is the Order to Consolidate and the second is the Order to continue the injunctive relief granted on February 11, 2022.

[4] The Orders will be signed in the form proposed by the City.

[5] Reasons will follow.

[2] These are the reasons.

Overview

[3] On February 11, 2022, on application by the Plaintiff, the Automotive Parts Manufacturers' Association ("APMA"), and supported by the Interveners, the Corporation of the City of Windsor ("City") and the Attorney General of Ontario ("AG"), I granted an injunction to end the blockade of the Ambassador Bridge ("the Bridge") in the City of Windsor, finding that the test for an interim interlocutory injunction had been met pursuant to s. 101 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43 ("CJA"), r. 40.01 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194 and s. 440 of the *Municipal Act, 2001*, S.O. 2001, c. 25 (see *Automotive Parts Manufacturers' Association v. Jim Boak*, 2022 ONSC 1001).

[4] I ordered the injunction to be effective as of February 11, 2022 at 7:00 p.m.

[5] On February 18, 2022, the City sought to continue the injunction, on varied terms, until such time as it is varied or discharged, pursuant to s. 440 of the *Municipal Act, 2001*. At this hearing, the City also sought to continue the injunction as the Applicant, with the APMA and AG as party interveners.

[6] For the following reasons, the requested relief was granted.

[7] In the days since the injunction was granted, the City asserts the following:

(a) protesters defied the court order of February 11, 2022 ("the "February 11 Order"), with numbers increasing and peaking at between 600 and 800 individuals during the evening of Saturday, February 12, 2022;

(b) police arrested 43 individuals on Sunday, February 13, 2022 on charges of mischief exceeding \$5,000 and/or disobeying the February 11 Order contrary to ss. 430(1) and 127 of the *Criminal Code*, R.S.C. 1985, c. C-46;

- (c) protesters continue to violate City by-laws – on Saturday, February 12, 2022, Provincial Offence Officers issued 28 tickets for by-law infractions and at least seven vehicles were towed from the protest area;
- (d) protesters have continued to breach municipal by-laws, including but not limited to:
 - (i) By-law 9148 (traffic by-law),
 - (ii) By-law 233-2001 (vehicle idling by-law),
 - (iii) By-law 25-2010 (protection of highways by-law),
 - (iv) By-law 6716 (noise by-law), and
 - (v) By-law 9023 (parking by-law);
- (e) there is evidence that the protesters plan to continue to protest on roadways approaching the Bridge;
- (f) on Tuesday, February 15, 2022, police successfully intercepted a convoy of several transport trucks from Ottawa, with the suspected intention of heading to Windsor; and
- (g) as a result of the continued threat of a new blockade, police continue to control traffic flow on Huron Church Road to protect access to the Bridge.

Preliminary Issue

[8] The request of the City to be the named applicant was addressed as a preliminary issue. The City takes the position that this procedure will streamline and simplify the proceedings, reduce the burden on the court and the parties and reflect the court's finding that "it will be virtually impossible to recover damages from the protesters."

[9] The City requested that the court exercise its discretion to accept its Notice of Application as the underlying proceeding in this matter, or, in the alternative, consolidate the City's application with the present proceeding.

[10] The request of the City was supported by the APMA and the AG.

[11] The request was opposed by counsel representing The Democracy Fund, and Citizens for Freedom. The arguments in opposition focused on form, not substance. Counsel for The Democracy Fund submitted that the APMA had not taken the formal step of issuing an action. Counsel suggested that the APMA was not honouring its undertaking to commence an action. I reject these suggestions. The record contains a draft Notice of Action and there is no evidence to indicate that APMA is resiling from its undertaking.

[12] The issues before the court are real. The February 11 Order is in effect for 10 days and the motion to continue the injunction must be addressed on a timely basis.

[13] There was no jurisdictional challenge to the court's authority to grant the relief requested by the City.

[14] Rule 1.04 of the *Rules of Civil Procedure* reads as follows:

General Principle

1.04 (1) These rules shall be liberally construed to secure the just, most expeditious and least expensive determination of every civil proceeding on its merits.

[15] This rule has application in these circumstances. The City is, in effect, switching places with the APMA. In view of the City's request to continue the injunction pursuant to s. 440 of the *Municipal Act, 2001*, it is logical for the City to be the named applicant. In my view, it is appropriate to grant the order reflecting that the City is now the applicant in these proceedings, with the APMA and the AG as party interveners and The Democracy Fund as a friend of the court.

[16] The order giving effect to the foregoing has been signed.

Evidence

[17] The City and the APMA gave notice in accordance with the requirements of the February 11 Order. The City issued a press release on February 12, 2022 containing a URL link to the February 11 Order, as well as the date, time and location of this motion. The City also took steps to give notice by posting a link to the February 11 Order on the front-page banner of the City's website, issuing further press releases and posting large-format copies of the February 11 Order at various locations along Huron Church Road.

[18] Press releases were also circulated by the APMA.

[19] The City contends that on February 11, 2022, Windsor police issued a news update to the protesters to make them aware that anyone blocking the streets at or near the Bridge constituted public mischief and that anyone blocking streets or assisting others in doing so may be committing a criminal offence and be subject to arrest.

[20] Mr. Jason Reynar, Chief Administrative Officer of the City, provided evidence in his affidavit of February 17, 2022 of the steps the City took to publicize the February 11 Order. He made specific reference to press releases, links to the webpage and the signage that was distributed.

[21] Deputy Chief Bellaire stated in his affidavit of February 17, 2022, that he is responsible for implementing the response to any incident involving the Bridge. He also stated that the Critical Incident Commanders have kept him informed about what has been occurring in the area of the Bridge and the police response to any problems or threats to that area.

[22] Deputy Chief Bellaire stated in his affidavit of February 17, 2022 that after the February 11 Order came into effect, officers observed increased demonstrator presence in the Huron Church Road area. He states that he was advised by command personnel that on the evening of February 11, 2022, at the intersection of Huron Church Road and Tecumseh Road West, there were over 200 protesters present; there were 50 to 60 vehicles present; a tent and food tables had been set up;

a camper trailer was blocking the northbound lane; children were on the scene who appeared to be under the age of 14 years old; and there was excessive honking.

[23] At the intersection of Huron Church Road and College Avenue, there were over 300 protesters present; there were numerous vehicles north of College Avenue, including tractor-trailers and large trucks, travel trailers and passenger vehicles; there were numerous vehicles south of College Avenue, including tractor-trailers in large trucks; there were children on the scene; there were several tents with food tables; and there were generators, gas cans and barbecues.

[24] Deputy Chief Bellaire stated that on the morning of February 12, Windsor police, supported by their policing partners, moved to direct protesters away the primary entrance to the Bridge at the north end of Huron Church Road. However, rather than dispersing, Deputy Chief Bellaire stated that more individuals were observed to arrive on scene. Police operations were paused and police set up concrete barriers on Huron Church Road.

[25] At 6 a.m. on February 12 at Huron Church Road and Tecumseh Road West, there remained 25-30 support vehicles in nearby parking lots with people sleeping inside and numerous vehicles remaining in the northbound lanes blocking traffic. At the intersection of Huron Church Road and College Avenue, there was a crowd of approximately 75 people; large tents were still present around the roadway and surrounding parking lot; people were sleeping in vehicles on side streets; and vehicles continue to block all Bridge traffic except one emergency lane, with people believed to be sleeping inside some of the vehicles.

[26] By 2 p.m. on Saturday, February 12, 2022, Deputy Chief Bellaire stated that Windsor police observed that at the intersection of Huron Church Road and Tecumseh Road West, there were approximately 600 protesters on scene crowding the scene at the cement barriers and children were observed with their families. At the intersection of Huron Church Road and College Avenue, police were able to control the intersection.

[27] By Saturday evening, February 12, protester numbers increased to between approximately 600 and 800 individuals, with the majority of protesters located at the intersection of Huron Church Road and Tecumseh Road West. Deputy Chief Bellaire stated that vehicles supporting the protest filled parking lots and plazas along Tecumseh Road West and varying numbers of protesters and vehicles were also observed at the intersection of Huron Church Road and College Avenue and at the secondary entrance to the Bridge.

[28] Deputy Chief Bellaire stated that on Sunday, February 13, protesters and vehicles remained in the area and police once again gathered to disperse the protesters blocking the Bridge. Police made over 40 arrests over the course of the day and continued to engage with protesters to clear them from private property in the area.

[29] Early in the morning of Monday, February 14, 2022, Deputy Chief Bellaire stated that police announced the Bridge was open to traffic.

[30] Deputy Chief Bellaire stated that since the beginning of the protest, police have:

(a) made 44 arrests;

(b) laid a total of 86 charges, including 43 charges for breach of a court order; and

(c) seized and towed at least 18 vehicles.

[31] Most of those individuals who were arrested have been released.

[32] Deputy Chief Bellaire added that throughout the operations, the Windsor Police Services' primary goal was to ensure public safety and to bring the protest to a peaceful conclusion.

[33] Deputy Chief Bellaire concluded his affidavit by noting that, based on police monitoring of social media both during and after the protest, there is a risk that the protesters may return. Police are also aware of a poster advertising for protesters to regroup on Saturday, February 19, 2022 in the City. His concerns are detailed at paragraphs 45-53 of his affidavit. Of note, Deputy Chief Bellaire stated that on February 15, 2022, police learned of a convoy of several transport trucks from Ottawa with the suspected intention of heading to Windsor. The convoy was intercepted by police at approximately 8:30 p.m. that day. As a result of these developments and the risk that protesters may return, police have maintained an elevated presence in the area, setting up traffic controls on roads surrounding the Bridge.

[34] Deputy Chief Bellaire stated that as of 6 p.m. on February 17, 2022, police continued to maintain a presence in the area and that various physical and human resources to control traffic were still in place.

[35] Mr. Fabio Costante, City Councillor for Ward 2 of the City, noted that residents and businesses in Ward 2 have been particularly impacted by the disruption caused by the protest, which occurred in the central part of the Ward. The residents have had to endure not only the nuisances and business disruptions caused by the protest, but also traffic and public transit disruptions that have isolated them from the rest of the City.

[36] Affidavits in response were submitted by a lawyer, a paralegal and a legal assistant at the firm representing the Citizens for Freedom.

[37] Mr. Stephen Heimann stated that over the past five years, he has travelled in the area of the Bridge and has experienced traffic delays for a variety of reasons.

[38] In my view, the statements of Mr. Heimann are irrelevant for the purposes of this motion.

[39] Ms. Sherri Peroni attached two photographs to her first affidavit of February 18, 2022 "which purports to show law enforcement enforcing the injunction dated February 11, 2022."

[40] It is not possible to draw any conclusions from these photographs. The context in which they were taken is unknown. Ms. Peroni also references a number of media articles that are not relevant to the issues before the court. Examples are statements about global chip shortages, supply chain issues and the impact of vaccine mandates on laid-off, unvaccinated workers. This affidavit was not helpful.

[41] A second affidavit from Ms. Peroni provided comment with respect to events which occurred in 2011 and 2012 and their impact on border crossings. These statements are irrelevant

to this motion as are references to the border crossing in Coutts, Alberta, the Windsor and Detroit Tunnel and the Blue Water Bridge. The motion before the court relates to the Ambassador Bridge. References to Canadian Border Service Agency Reports that the Bridge is “Temporarily Closed” do not assist the position of the Democracy Fund, as it indicates that traffic at the Bridge is being impeded. References that on February 14, 2022 and February 17, 2022 there was no delay at the Bridge is only indicative that, at that point in time, the traffic at the Bridge was not impeded.

[42] Mr. Nicholas Wansbutter made statements that he has been contacted by several persons described as “protesters” who were now facing criminal charges in relation to the February 11 Order for activities which occurred in Windsor, a number of whom were arrested despite having been physically located on the sidewalk, grass or other locations that are not in the vicinity of the entrance to the Bridge. He also referenced online video evidence of “peaceful individuals protesting in a manner appearing to be consistent with the rights as guaranteed by the *Canadian Charter of Rights and Freedoms*....” He referenced another video showing “a peaceful protester being ambushed from behind by police in a violent arrest.” He also stated that he had been informed that videos exist “on social media which depict abuse of power by the Windsor police and their arrest and treatment of protesters.” Mr. Wansbutter’s affidavit is not helpful. It consists of statements of his opinion, his own interpretation of facts, reference to “charges” with no accompanying statement of what those charges are and references to video evidence that are not of any assistance because they do not provide any context.

[43] In my view, the evidence provided by the parties associated with Citizens for Freedom is of no assistance and carries no weight.

[44] To the extent that there is any conflict in the evidence, I accept the evidence of James Rayner, Fabio Costante, Cheryl McKinnon and Deputy Chief Bellaire.

Analysis

[45] In preparing these reasons, I have reviewed and considered the following cases:

Newcastle Recycling Ltd. v. Clarington (Municipality), [2005] O.J. No. 5344 (C.A.) (“Newcastle”); *Amaranth (Township) v. Ramdas*, 2020 ONSC 2428 (“Amaranth”); *Retirement Homes Regulatory Authority v. In Touch Retirement Living for Vegetarians/Vegans Inc.*, 2019 ONSC 3401 (“Retirement Homes”); *Ontario v. Adamson Barbecue Ltd.*, 2020 ONSC 7679 (“Adamson”); *Canadian National Railway Company v. Doe*, 2020 ONSC 4152 ; *RJR-MacDonald Inc. v. Canada (Attorney General)*, [1994] 1 S.C.R. 311 (“RJR-MacDonald”); *Hamilton (City) v. Loucks* (2003), 232 D.L.R. (4th) 362 (Ont. S.C.) (“Hamilton”); *Gavin Downing v. Agri-Cultural Renewal Co-operative Inc. O/A Glencolton Farms (“ARC”) et al.*, 2018 ONSC 128 (“Downing”); *Ontario (Attorney General) v. Paul Magder Furs Ltd.* (1991), 6 O.R. (3d) 188 (C.A.) (“Magder”).

[46] The issues for this Court to decide are:

- (a) Has the City established a strong *prima facie* case that the protesters have breached municipal by-laws and will continue to do so?

- (b) Is a permanent statutory injunction under s. 440 of the *Municipal Act, 2001* the appropriate remedy? Alternatively, should an extension of the February 11 Order be granted under r. 40.02(3) of the *Rules of Civil Procedure* and s. 101 of the *CJA*?

a. *Has the City established a strong prima facie case that the protesters have breached municipal by-laws and will continue to do so?*

[47] I find that the City has established a strong *prima facie* case, on a balance of probabilities, that the protesters have breached multiple municipal by-laws and that there is a risk they will continue to do so based on the following uncontroverted evidence:

- (i) Between the February 11 Order coming into effect at 7:00 pm on February 11, 2022 and into Sunday, February 13, 2022, the protesters continued to breach multiple municipal by-laws, as is evidenced by multiple tickets issued for by-law infractions including the need to have multiple vehicles towed from the roadways approaching the Bridge. Protesters also breached the February 11 Order, as is evidenced by multiple arrests of individuals for *Criminal Code* charges, including disobeying the February 11 Order. Further, I note that after the February 11 Order came into effect, the number of protesters obstructing the Bridge increased over the course of the evening and into the following evening.
- (ii) There is evidence of the protesters' expressed intent to continue their blockade despite the February 11 Order.
- (iii) There is evidence that the protesters plan to continue to protest on roadways approaching the Bridge. This includes the successful interception of a convoy of several transport trucks from Ottawa with the suspected intention of heading to Windsor, as well as police monitoring of social media which identifies calls for protesters to regroup, including messages of "it's not over," "we are not done" and "Civil war time."
- (iv) As a result of the continued threat of a new blockade, police continue to control traffic flow onto Huron Church Road to protect access to the Bridge. In other words, traffic in the area is not flowing normally due to the threat of further blockades.

[48] The evidence clearly establishes that even after being informed of the terms of the February 11 Order, the protesters chose to ignore it and continue to impede and obstruct access to the Bridge.

[49] I find that the City has established a strong *prima facie* case, on a balance of probabilities, that there has been a deliberate and continuing breach of municipal by-laws and the February 11 Order. I also find that there is a risk that protesters will reassert a presence on the roadways, thereby impeding or blocking access to the Bridge.

b. *Is a permanent injunction the appropriate remedy?*

[50] Having found that the City has established a strong *prima facie* case that protesters breached municipal by-laws and the February 11 Order, and that there is a risk they will continue to do so, the next issue is whether permanent injunctive relief is the appropriate remedy.

[51] The City is seeking a permanent injunction pursuant to s. 440 of the *Municipal Act, 2001*, to enjoin the protesters from continuing to violate the City's by-laws. Section 440, under the section "General Enforcement Powers," provides the City with the authority to seek an injunction to restrain a person (or persons) from contravening its by-laws. In particular, it provides as follows:

Power to restrain

440 If any by-law of a municipality or by-law of a local board of a municipality under this or any other Act is contravened, in addition to any other remedy and to any penalty imposed by the by-law, the contravention may be restrained by application at the instance of a taxpayer or the municipality or local board.

[52] As I discussed in my Reasons of February 14, 2022, the granting of a statutory injunction involves a different analysis than the granting of an equitable injunction under the common law. The three-part test for an interim injunction set out in *RJR-MacDonald Inc.* at paras. 77-80 does not strictly apply in applications for a statutory injunction pursuant to s. 440 of the *Municipal Act, 2001*. The test for injunctive relief to restrain breaches of by-laws is narrower. In such cases, the moving party will not ordinarily have to establish inadequacy of damages or irreparable harm and that the balance of convenience favours the granting of the injunctive relief because the public authority is presumed to be acting in the best interests of the public and a breach of the law is considered to be irreparable harm to the public interest: see *Newcastle*, at para. 32; *Amaranth*, at para. 54; and *Adamson*, at para. 17.

[53] Accordingly, on an application for a statutory injunction, the applicant need only demonstrate that there is a serious issue to be tried and this must be demonstrated by establishing a strong *prima facie* case on a balance of probabilities: *Newcastle*, at para. 32; *Hamilton*, at para. 37; *Amaranth*, at paras. 51-55; and, *Adamson*, at para. 16.

[54] Based on a review of the authorities cited by the City, the following general principles apply when an injunction is authorized by statute:

- (i) The applicant need only to establish a strong *prima facie* case, on a balance of probabilities, that there is a breach of the applicable statute. There is no obligation on the municipality to provide "compelling evidence" that an injunction is warranted: see *Newcastle*, at para. 32.
- (ii) Proof of actual damages suffered or proof of harm to the public is not an element of the legal test.
- (iii) There is no need for other enforcement remedies to have been pursued.
- (iv) The factors considered by a court when considering equitable relief will have a more limited application. For example, hardship from the imposition and enforcement of an injunction will generally not outweigh the public interest in having the law obeyed.
- (v) There is a strong public interest in ensuring that all citizens in our society obey the law. Therefore, there is a presumption that the courts will grant interlocutory injunctions to compel compliance with the law as opposed to denying the injunction so that a

defendant may continue to break the law. Any court tolerance of a continuing breach of the law will be extremely rare.

[55] The Court does maintain a residual discretion as to whether to grant the injunction even if there is a clear breach of the statute. However, the Court's residual discretion is limited. Where a municipal authority seeks an injunction to enforce a by-law that it establishes is being breached, any discretion the court may have to permit unlawful conduct is narrow and arises only in circumstances that are truly exceptional: see *Newcastle*, at para. 32; and *Amaranth*, at para. 55.

[56] The onus to raise the exceptional circumstances lies with the respondent, and those circumstances are limited: *Retirement Homes*, at para. 48. These "exceptional circumstances" could include: the offending party has ceased the activity; the injunction is moot and would serve no purpose; the offending party has provided clear and unequivocal evidence that the unlawful conduct will cease; there is a right that pre-existed the enactment that was breached; there is uncertainty that the offending party is flouting the law or where the conduct is not what the enactment was intended to prevent: *Downing*, at para. 113.

[57] None of the exceptional circumstances were credibly advanced by the Interveners, The Democracy Fund or Citizens for Freedom. I also parenthetically note that none of the Defendants who were provided notice of this motion chose to participate.

[58] In his submissions, Mr. d'Ailly conceded that the protesters continued to commit breaches of municipal by-laws even after the February 11 Order came into effect on February 11, 2022 at 7:00 pm. He submits that protesters committed unlawful acts only because the police chose to use their discretion to not immediately arrest any of the protesters. I do not accept the submissions of Mr. d'Ailly or of Mr. Kitchen that this injunction should not be granted because the February 11 Order gave police officers discretion as to how and when the February 11 Order would be enforced by the arrest or removal of the protesters breaching the law.

[59] Court orders are not recommendations or suggestions to be followed at the discretion of those to whom it applies. The rule of law requires that everyone obey the law. Significant, organized, deliberate and persistent defiance of the law and court orders is a serious threat to the rule of law which is one of the foundations of a functioning democracy. The protesters are obliged, as is every Canadian citizen, to follow the law and not breach municipal by-laws or court orders that prohibit unlawful conduct regardless of whether or not police choose to enforce the law by arresting them.

[60] I also do not accept their submissions, or the submissions of Mr. Honner, that there are other enforcement remedies available to address unlawful conduct committed by the protesters, such as the *Emergencies Act*, R.S.C. 1985, c. 22 (4th Supp.) and/or the *Criminal Code*, and therefore an injunction is not warranted. As set out earlier, the test for a statutory injunction does not require consideration of the availability of other enforcement remedies.

[61] Finally, Mr. Kitchen again raises the issue of the protesters' rights under ss. 2(b) and (c) the *Canadian Charter of Rights and Freedoms*. I re-iterate from my Reasons of February 14, 2022, that absent a constitutional challenge to the by-laws in question, they are presumptively valid and

remain in force and in effect. A consideration of the protesters' *Charter* rights is therefore not required.

[62] No constitutional challenge has been advanced by anyone on this motion - either to the municipal by-laws in question or to the February 11 Order. As I stated in my Reasons of February 14, 2022, neither the municipal by-laws nor the injunction granted on February 11, 2022 prevent the protesters from lawfully expressing their message and exercising their ss. 2(b) and (c) *Charter* rights. However, the *Charter* does not protect expressive conduct by unlawful means, which includes breaching presumptively valid laws or court orders. One of the court's most important rules is that if it makes an order, unless and until that order is either stayed or reversed, or an exception to the order is specifically granted, the order must be respected and obeyed.

[63] In *Magder*, the appellant took the position that he could continue to defy the law and court orders prohibiting him from opening his retail establishment on Sundays and holidays because, in his opinion, the Act in question infringed his *Charter* rights. In making the trite point of law that one cannot ignore the law or a court order simply because one held the opinion that it was ineffective on constitutional grounds, or on any other grounds, the court said the following at para. 12:

... But the Charter is no licence to break the law or defy an order of the court. It is elementary that so long as a law or an order of the court remains in force it must be obeyed. In *Canada (Human Rights Commission) v. Taylor*, [1990] 3 S.C.R. 892, 75 D.L.R. (4th) 577, while the majority found it unnecessary to deal with the issue, McLachlin J. said at p. 974 S.C.R., p. 635 D.L.R.:

In my opinion, the 1979 order of the Tribunal, entered in the judgment and order book of the Federal Court in this case, continues to stand unaffected by the Charter violation until set aside. This result is as it should be. If people are free to ignore court orders because they believe that their foundation is unconstitutional, anarchy cannot be far behind. The citizens' safeguard is in seeking to have illegal orders set aside through the legal process, not in disobeying them.

[64] The same principle applies in this case. It is no answer to the issue on this motion that the continuation of the injunction sought is not warranted because protesters have the right to freedom of expression and freedom of assembly. The protesters must comply with the law and the issue on this motion is whether the City has established that an injunction is warranted because the protesters have breached the law and will likely continue to do so.

[65] The record before the court amply demonstrates not only that the protesters have committed "clear breaches" of the municipal by-laws and the February 11 Order, 2022 but that there remains a risk that they will continue to do so.

[66] I find that the City has met the test for a permanent injunction pursuant to s. 440 of the *Municipal Act, 2001* and that there have been no credible exceptional circumstances advanced to warrant exercising my discretion to refuse to grant the injunction sought by the City. Indeed, it is

in the public interest that a permanent injunction be granted particularly where there has been a persistent and deliberate flouting of the law.

[67] Given my conclusion that a permanent injunctive order is warranted under the provisions of s. 440 of the *Municipal Act, 2001*, I need not determine if a similar order is justified under s. 101 of the *CJA*. I make no finding on whether such an order can or should be granted under the *CJA*.

[68] Finally, I repeat what I stated in the February 14, 2022 Reasons, namely: “Simply put, freedom of expression does not extend to the point that the protesters’ activities can result in the denial of fundamental rights and freedoms to all those detrimentally affected by the blockade.”

[69] This type of activity must cease. Based on my assessment of the evidence, a time-limited injunction would not provide the City and its residents with the required degree of certainty that by-law breaches will cease. The City and its residents are entitled to have this certainty. In my view, a time-limited injunction, as suggested by counsel to The Democracy Fund and Citizens for Freedom, would not provide the necessary assurances to the City and its residents.

Conclusion

[70] In the result, the February 11 Order is extended under s. 440 of the *Municipal Act, 2001* on the terms set out in the draft order submitted by counsel to the City. The Order has been signed in this form.



Chief Justice G.B. Morawetz

Date: February 22, 2022

This is Exhibit "XXXXX" mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of

April, 2022.

A handwritten signature in blue ink, appearing to read "Nur Muhammed-Ally", is written over a horizontal line.

A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

Court File No.

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N :

CITY OF OTTAWA

Applicant

- and -

PERSONS UNKNOWN

Respondents

- and -

ATTORNEY GENERAL OF ONTARIO

Proposed Intervener

**MOTION RECORD OF THE
ATTORNEY GENERAL OF ONTARIO
(Motion Returnable February 14, 2022)**

THE ATTORNEY GENERAL OF ONTARIO

Constitutional Law Branch
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Counsel for the Attorney General of Ontario

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BORDEN LADNER GERVAIS LLP
100 Queen Street, Suite 1300
Ottawa ON K1P 1J9 455

Lawyers for the Applicant

TABLE OF CONTENTS

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1.	Notice of Motion dated February 12, 2022	4-7
2.	Draft Order	8-10

Court File No.

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

CITY OF OTTAWA

Applicant

- and -

PERSONS UNKNOWN

Respondents

- and -

ATTORNEY GENERAL OF ONTARIO

Proposed Intervenor

NOTICE OF MOTION

THE MOVING PARTY, the Attorney General of Ontario, will make a motion to a Justice of the Ontario Superior Court of Justice in Ottawa on February 14, 2022 at 12:00 p.m. or as soon after that time that the motion can be heard.

PROPOSED METHOD OF HEARING: The motion is to be heard orally by videoconference to the Courthouse at the following location: 161 Elgin Street, Ottawa, Ontario K2P 2K1.

THE MOTION IS FOR:

- (a) An order granting the Attorney General leave to intervene in this matter as a party pursuant to Rule 13.01 of the *Rules of Civil Procedure*;
- (b) In the alternative, an order granting the Attorney General leave to intervene in this matter as a friend of the court pursuant to Rule 13.02 of the *Rules of Civil Procedure*;

- (c) An Order, if necessary, abridging the time for, or alternatively, dispensing with service of this Notice of Motion;
- (d) An Order that no costs be awarded either for or against the Attorney General in respect of this motion and the underlying application; and
- (e) Such further and other relief as counsel may advise and this Honourable Court may grant.

THE GROUNDS FOR THE MOTION ARE:

- (a) This application concerns the demonstration (the “Demonstration”) being carried out by organizers and participants of the “Freedom Convoy 2022” in the City of Ottawa since January 28, 2022.
- (b) Demonstrators are currently violating by-laws passed by Ottawa regarding idling, noise, open fires and fireworks, which violations are adversely impacting Ottawa, its residents, and its businesses.
- (c) Both at common law and under the *Ministry of the Attorney General Act*, the Attorney General is the Chief Law Officer of the Crown and the guardian of the public interest of all Ontarians with responsibility to superintend all matters connected with the administration of justice in Ontario.
- (d) As the guardian of the public interest, the Attorney General has a unique interest in legal proceedings that raise matters of general public importance and has a perspective on behalf of the public at large that is distinct from the immediate parties.
- (e) The underlying proceeding in this case raises such issues of general public importance, including the impact of the Demonstration on public health and safety, the freedom of movement of Ontarians, and the rule of law.
- (f) The Attorney General has special expertise in the *Canadian Charter of Rights of*

Freedoms, which may be raised by the Respondents.

- (g) The Attorney General intervened in the recent matter of *Automotive Parts Manufacturers' Association v. Jim Boak*, CV-22-00030791, which resulted in an injunction prohibiting impeding access to the Ambassador Bridge in Windsor.
- (h) The Attorney General's intervention would cause no prejudice to the parties, as he would abide by any timetable fixed by the Court or agreed to between the parties.
- (i) *Rules of Civil Procedure*, RRO 1990, Reg 194, Rules 2.03, 13.01 and 13.02.
- (j) *Municipal Act*, SO 2001, c 25, s. 440.
- (k) *Courts of Justice Act*, RSO 1990 c C.43, s. 109.
- (l) *Ministry of the Attorney General Act*, RSO 1990 c M.17.
- (m) Such further and other grounds as counsel may advise and this Court may accept.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

- (a) The Applicant's Notice of Application dated February 11, 2022.
- (b) Such further and other evidence as counsel may advise and this Court may deem just.

ESTIMATED TIME FOR ORAL ARGUMENT: 15 minutes.

February 12, 2022

THE ATTORNEY GENERAL OF ONTARIO
Civil Law Division
Constitutional Law Branch
720 Bay Street, 4th Floor
Toronto, Ontario
M7A 2S9

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Counsel for the Proposed Intervenor

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Borden Ladner Gervais LLP
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Lawyers for the Applicant

Court File No.

**ONTARIO
SUPERIOR COURT OF JUSTICE**

JUSTICE _____	)	MONDAY, THE 14 TH DAY
	)	
	)	OF FEBRUARY, 2022

B E T W E E N:

CITY OF OTTAWA

Applicant

- and -

PERSONS UNKNOWN

Respondents

ORDER

THIS MOTION, made by the Attorney General of Ontario for leave to intervene in the within proceeding pursuant to Rule 13.01 of the *Rules of Civil Procedure*, was heard at Ottawa on February 14, 2022 by videoconference.

UPON READING the Notice of Motion dated February 12, 2022, the materials filed by the City of Ottawa in the underlying application, and upon hearing oral arguments for counsel for the Applicant and the Attorney General of Ontario, via videoconference:

1. **THIS COURT ORDERS** that the Attorney General of Ontario shall be and is hereby granted leave to be added as a party to this proceeding as an intervener pursuant to Rule 13.01 of the *Rules of Civil Procedure*.
 2. **THIS COURT ORDERS** that the Attorney General of Ontario shall be and is hereby added as a party to this proceeding, and shall have all rights of a party with respect to this proceeding, subject to paragraph 3 herein.
 3. **THIS COURT ORDERS** that no costs shall be awarded either for or against the Attorney General of Ontario in respect of this motion or the underlying proceeding.
-

CITY OF OTTAWA

v.

PERSONS UNKNOWN

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT OTTAWA

ORDER

THE ATTORNEY GENERAL OF ONTARIO

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Counsel for the Proposed Intervenor

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceedings commenced at Ottawa

MOTION RECORD OF THE
ATTORNEY GENERAL OF
ONTARIO

(Motion Returnable February 14, 2022)

THE ATTORNEY GENERAL
OF ONTARIO

Civil Law Division
Constitutional Law Branch
720 Bay Street, 4th Floor
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waleed.malik@ontario.ca

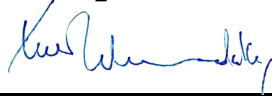
Counsel for the Attorney General of Ontario

This is Exhibit “YYYYY” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of

April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

Menu ▼



City granted injunction to address disregard for municipal by-laws

February 15, 2022

Announcements and Events

The Ontario Superior Court of Justice has granted the City's request for an injunction to address widespread disregard for municipal by-laws resulting from ongoing demonstrations in downtown Ottawa.

The City provided the court with overwhelming evidence of protestors committing by-law violations, specifically setting unlawful fires, discharging fireworks, causing noise, blocking and damaging highways, and idling vehicles in contravention of the Idling Control By-law. These contraventions negatively impacted our municipal assets – like roadways, sidewalks, transit and parks – as well as the health and welfare of residents, businesses and the environment.

As with the recently enacted provincial emergency orders, the injunction will provide law enforcement authorities another tool to help restrain anyone from committing these offences in the future.

The court order has now been issued and is [available to the public](#).

For more information on City programs and services, visit ottawa.ca, call 3-1-1 (TTY: 613-580-2401) or 613-580-2400 to contact the City using Canada Video Relay Service. You can also connect with us through [Facebook](#), [Twitter](#) and [Instagram](#).

> Public Inquiries

311@ottawa.ca

311

<https://ottawa.ca>

> Media Inquiries

medias@ottawa.ca

613-580-2450

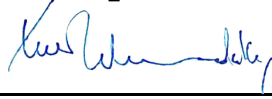
<https://ottawa.ca>

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This is Exhibit “ZZZZZ” mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of
April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel



Court File No. CV-22-88569

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Electronically issued: 02/15/2022

Délivré par voie électronique
Ottawa

THE HONOURABLE ASSOCIATE CHIEF)
JUSTICE FAYE MCWATT)

MONDAY, THE 14TH

DAY OF FEBRUARY, 2022

B E T W E E N:

CITY OF OTTAWA

Applicant

– and –

PERSONS UNKNOWN

Respondents

– and –

ATTORNEY GENERAL OF ONTARIO and
ATTORNEY GENERAL OF CANADA

Intervenors

ORDER

THIS APPLICATION, made by the City of Ottawa was heard this day at the Court House,
161 Elgin Street, Ottawa, Ontario.

ON HEARING the submissions of the applicant, and reading the materials filed, and having
regard to the urgency of the situation,

1. **THIS COURT ORDERS** that an interlocutory injunction is granted, pursuant to section 440 of the *Municipal Act*,

2. **THIS COURT ORDERS** that any persons having notice of this Order are hereby restrained and enjoined from directly or indirectly, by any means whatsoever:

a. Breaching the following By-laws of the City of Ottawa: Open Air Fire By-law 2004-163, Fireworks By-law 2003-237, Noise By-law 2017-255, Use and Care of Roads By-law 2003-498, and the Idling Control By-law 2007-266, in particular:

i. With respect to Open Air Fire By-law 2004-163:

1. They shall not set or maintain an open air fire without first having obtained the necessary permit from the Fire Chief;

ii. With respect to Fireworks By-law 2003-237:

1. They shall not discharge any firecrackers or any fireworks.

iii. With respect to Noise By-law 2017-255:

1. They shall not cause any noise likely to disturb the inhabitants of the City, including but not limited to, causing noise by honking air horns, car horns, train horns, in real-time or playing pre-recorded horns

iv. With respect to Use and Care of Roads By-law 2003-498:

1. They shall not encumber or damage a highway by any means, including but not limited to, encumbering or damaging the highway with tents, structures, or appliances;

2. They shall not set or carry fire on a highway; and

3. They shall not throw, pile, store or cause any material to be thrown or piled upon a highway except for the purpose of having it immediately delivered upon adjacent premises.

v. Idling Control By-law 2007-266 and in particular:

1. They shall not cause or permit a vehicle to idle for more than three (3) consecutive minutes in a sixty (60) minute period, unless:
 - a. it is an occupied vehicle, within the demonstration zone as described in Appendix A to this order, and the temperature outside is less than negative fifteen (15) degrees Celsius including the windchill value as determined by the Environment Canada temperature readings; or
 - b. it is an occupied vehicle, outside the demonstration zone as described in Appendix A to this order, and the temperature outside the vehicle is less than five degrees Celsius including the windchill value as determined by the Environment Canada temperature readings.
 - b. physically preventing, impeding, restricting or in any way physically interfering with, or counselling others to impede, restrict or in any way physically interfere with, another person's compliance with this order;
 - c. threatening, harassing or intimidating the applicant's employees, servants, agents or other persons engaged in the administration or enforcement of municipal by-laws; and
 - d. physically interfering with or counselling others to physically interfere with the performance by the applicant of its obligations under the *Municipal Act, 2001* and its contractual relationships with its employees, servants, agents or other persons having business with the applicant.
3. **THIS COURT ORDERS** that the respondents and each of them, and any and all persons having knowledge of this Order, forthwith remedy any contraventions of the By-laws as set out in subsection 2(a) of this Order, and;
4. **THIS COURT ORDERS** that this order be directed to the Sheriff of the County of Ottawa for enforcement and directs the Ottawa Police Service, and any Police Service assisting the Ottawa Police Service, to assist the Sheriff in the enforcement of the order by removing from the subject property any person contravening its provisions, and/or removing any objects being used in

contravention of bylaws, subject to the discretion of the police, and any Police Service assisting the Ottawa Police Service, with respect to the timing and means of enforcement.

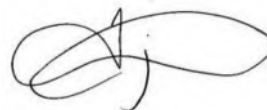
5. **THIS COURT ORDERS** that the terms of this Order shall remain in force until varied or discharged by a further Order of the Court.

6. **THIS COURT ORDERS** that, provided the terms of this Order are complied with, the Respondents and other persons remain at liberty to engage in a peaceful, lawful and safe protest.

7. **THIS ORDER** shall not apply to persons acting in the course of or in the exercise of a statutory duty, power or authority.

8. **NOTICE OF THIS ORDER** may be given by: posting copies of this Order in or around downtown Ottawa; reading the Order to any person, including but not limited to reading the Order over an amplification system, and publishing this Order online.

9. **THIS COURT ORDERS** that the terms of this Order bind the respondents and every other person or legal entity who is subject to this Order and is given notice of the Order, as of the time such respondents, person or legal entity first receives notice of the Order, and whether or not such respondents, person or legal entity has been served with a copy of the Order.



McWatt A.C.J.S.C.J.

"Electronically Issued; February 15, 2022"

Appendix “A”

Appendix is a map the is included at section 3(ia) of the Idling Control By-law 2007-266.



THE CITY OF OTTAWA
Applicant

-and-

PERSONS UNKNOWN
Respondents

Court File No. CV-22-88569

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
OTTAWA

ORDER

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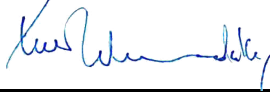
Lawyers for the Applicant

This is Exhibit "AAAAAA" mentioned to
and referred to in the affidavit of

Rebecca Coleman

Sworn before me this 4th day of

April, 2022.



A Commissioner for taking affidavits

Nur Muhammed-Ally, Counsel

CITATION: CITY OF OTTAWA v. PERSONS UNKNOWN, 2022 ONSC 1151
COURT FILE NO.: CV-22-88569
DATE: 2022-02-22

SUPERIOR COURT OF JUSTICE - ONTARIO

RE: CITY OF OTTAWA

AND:

PERSONS UNKNOWN

BEFORE: Associate Chief Justice Faye E. McWatt

COUNSEL: *Kevin P. Nearing and Michelle Doody*, for the Applicant

Andrew Gibbs, for the Intervenor, the Attorney General of
Canada

Padraic Ryan and Waleed Malik, for the Intervenor, the Attorney General of
Ontario

HEARD and DETERMINED: February 14, 2022

REASONS RELEASED: February 22, 2022

ENDORSEMENT

OVERVIEW

[1] The Respondents (Freedom Convoy 2022) arrived in Ottawa on January 28, 2022 to demonstrate, initially, against COVID-19 vaccine requirements for truckers to re-enter the country by land introduced by the Government of Canada on January 15, 2022. It has grown into a broader demonstration (“the Demonstration”) against COVID-19 public health measures.

[2] A rally was held on Parliament Hill on January 29, 2022.

[3] It did not stop nor did the demonstrators leave.

[4] On February 12, 2022, the City of Ottawa (the City”) alleged, in this ex-parte motion for an Interim Injunction, that the Respondents, Persons Unknown, were committing numerous

violations of municipal by-laws which were impeding and impairing the City's ability to perform essential functions and protect public safety.

[5] The City brings the motion for an injunction pursuant to section 440 of the *Municipal Act*, 2001, section 101 of the *Courts of justice Act* and Rule 40 of the *Rules of civil Procedure*, to restrain the Respondents from idling their vehicles in the downtown core, lighting open fires without a permit, setting off fireworks, causing excessive noise, and erecting temporary structures in contravention of municipal by laws 2007-266; 2004-163; 2003-137; 2003-498 and 2017-255.

[6] At the conclusion of the hearing on February 14, 2022, I granted an injunction pursuant to section 440 of the *Municipal Act*. These are the reasons why.

THE EVIDENCE

[7] From January 28, the Respondents have blockaded multiple streets in the downtown core of Ottawa, causing massive disruption to the city, including to residents, businesses, transit and emergency response services.

[8] The Respondents' behavior has also included parking and idling vehicles, including pickup trucks and semi-trucks, mainly in the downtown core of the city but also in other areas. The Respondents have been observed lighting open fires without permits, erecting temporary shelters, setting off fireworks and violating various provisions of the City's noise by-laws. The Respondents have gone so far as to bring hot tubs onto city property and erect a jumbotron on Wellington Street.

[9] The Respondents have stated that they are not leaving Ottawa until their demands are met.

[10] The February 13, 2022 Affidavit of Kim Ayotte sets out the evidence before me on this motion. I summarize it here.

[11] Mr. Ayotte is the General Manager of the City of Ottawa's Emergency and Protective Services ("EPS") Department.

[12] In his position, he oversees several units, including the City of Ottawa's Paramedic Service, By-law & Regulatory Services, Fire Service, and Security and Emergency Management. His office and staff work closely within the EPS Department, and with other City units, including Ottawa Public Health, Building Code Services, Community and Social Services, as well as with external agencies, including the Ottawa Police Service.

[13] On February 6, 2022, The Mayor of the City of Ottawa declared an emergency in relation to the Demonstration.

[14] On February 11, 2022, the Province of Ontario declared an emergency related to the Demonstration and other events across Ontario.

[15] Participants in the Demonstration are in different areas of the city. However, the heaviest concentration of trucks and vehicles is in the downtown core in an area that the Applicant has called the "Demonstration zone". The Demonstration has caused disruption across the city, including at

RCGT Park, located at 302 Coventry Road, 1500 Bronson Avenue, and various highways and walkways within the municipal boundaries. The disruptions are causing public safety issues.

[16] The demonstrators have parked transport trucks and other vehicles on city streets to block traffic. To support the parked transport trucks and the demonstrators, an organized network of services has cropped up. The demonstrators are providing fuel supplies for the vehicles, as well as food and beverage supplies, including barbequing and open fires to heat food. Other services and structures have been brought to the Demonstration including a stage for live music, a disc jockey for dance parties, hot tubs and an inflatable bouncy castle and inflatable slides for children who are with the demonstrators.

[17] All these activities violate one or more of the City's by-laws as follows.

Violations of Specific By-laws

[18] Photographs taken from CCTV footage of the intersection of Wellington Street and Metcalfe Street, in the downtown core, show vehicles idling for extended periods of time, beyond what is permitted under By-law 2007-266.

[19] Participants in the Demonstration are living in and/or around their parked vehicles and lighting open air fires throughout the city in contravention of the Open-Air Fire By-law No. 2004-163. City Fire Services have had to respond to these open-air fires lit without the proper permits. Multiple photos of stockpiled fuel and an open fire in Confederation park were filed as exhibits. No fire permits have been issued in relation to the Demonstration.

[20] Temporary structures, such as tents and lean-to shelters, have been erected on the roadways in downtown Ottawa and at RCGT Park in contravention of the Use and Care of Roads By-law No. 2003-498.

[21] Fireworks are being discharged in the downtown core in violation of section 5 of the Fireworks By-law 2003-237.

[22] The demonstrators' actions are interfering with the City's ability to maintain the roads, perform snow removal, conduct traffic enforcement, enforce by-laws, provide public transit and perform waste removal.

[23] The demonstrators have caused a significant increase of noise in the city and, in doing so, have contravened a number of provisions of the Noise By-law 2017-255. These include idling motor vehicles, honking vehicle horns, use of air horns and exceeding limits on sound reproduction or amplification devices.

Unreasonable Strain on the City's Resources

[24] The activities of the demonstrators have placed an unreasonable demand on the City's staff and the City's resources. The City had been inundated with complaints and calls from its residents and has not been able to effectively respond to the volume of calls and complaints.

[25] City By-law officers have been told by the OPS not to enter the Demonstration zone to issue tickets for by-law infractions due to concerns for their safety.

[26] Nonetheless, over 2,000 tickets for by-law infractions have been given out since January 28th in relation to the Demonstration. Specifically, 1,732 parking tickets have been issued in the Demonstration zone from January 28 to February 10, 2022.

[27] On February 8, as a response to the by-law breaches, the Ontario Court of Justice issued an Order approving the City's request for an increased set-fine for noise violations, open-air fires and use & care of roads violations. On February 9, the Ontario Court of Justice issued an Order approving the City's request for an increased set-fine for idling vehicles.

[28] The increased fines and public outcry have caused no notable decrease in the ongoing by-law violations due to the City's inability to respond to the violations - because of the activities of the Respondents and because By-law officers have been told not to enter the Demonstration zone unless they are accompanied by a member of the OPS.

THE LAW

A. Ex-Parte Motions and Unknown Persons

[29] Case law, from Ontario and across Canada, allows that an injunction can be ordered on unknown persons. Furthermore, procedural fairness is likely met in issuing the injunction on an *ex parte* basis so long as the three parts of the *RJR-MacDonald Inc. v. Canada (Attorney General)*, [1994] 1 S.C.R. 311 test are met, there is urgency for the order, and the moving party has provided full and frank disclosure.

[30] In *MacMillan Bloedel Ltd. v. Simpson*, [1996] 2 S.C.R. 1048, the Supreme Court of Canada dealt with the issue of whether courts have the power to grant injunctions against members of the public who are engaged in protests that interfere with the private rights of others. Related to this was the question of whether the courts could make orders against unidentified persons not named in the action or referenced by proxy as "Jane Doe" or "John Doe", and whether such orders are enforceable even if they are not named in the order. At paragraph 23 of the decision, the Court held that an injunction can be brought against non-parties on the basis of the long-standing principle that "non-parties may be seen as being, if not technically bound by the order, bound to obey the order".

B. Legislative Framework

Interim Injunction Under Section 101 of the *Courts of Justice Act*

[31] Section 101 of the *Courts of Justice Act*, RSO 1990, c C 43 and Rule 40.01 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194 authorize the Court to grant an interlocutory injunction "where it appears to a judge of the court to be just or convenient to do so."

[32] Rule 40.02(1) of the *Rules of Civil Procedure* provides that an interlocutory injunction or mandatory order may be granted on motion without notice for an interim period not exceeding ten days.

[33] The Supreme Court's test for a prohibitive interlocutory injunction in the *RJR-MacDonald* case is set out at paragraphs 40 and 48. Before exercising its discretion, a court must consider the following questions:

- a. Is there a serious question to be tried? In other words, has the moving party presented a case which is not frivolous or vexatious?
- b. Will the moving party, if unsuccessful, suffer irreparable harm which cannot be compensated other than through the granting of an injunction?
- c. Does the balance of convenience favour the moving party? In other words, who will suffer the greater harm from the granting or refusal of an interlocutory injunction, pending a decision on the merits?

a. Serious issue to be tried

[34] The party requesting an injunction has the onus of demonstrating there is a serious issue to be tried. The determination of whether the threshold of a "serious issue to be tried" is met is based on common sense and an extremely limited view of the case on the merits (*RJR*, at paras. 78, 83). So long as the claim is not frivolous or vexatious, this factor of the test will generally be satisfied (*RJR*, at paras. 44-56, 78).

b. Irreparable harm

[35] The second element of the *RJR-MacDonald* test is whether the moving parties will suffer irreparable harm if the injunction is not granted. What must be established in this part of the test is whether refusing to grant an injunction will cause harm that cannot be remedied at some later stage. "Irreparable harm" refers to the nature of the harm suffered, rather than its magnitude. "It is harm which either cannot be quantified in monetary terms or which cannot be cured, usually because one party cannot collect damages from the other" (*RJR*, at para. 59).

c. Balance of convenience

[36] The third factor, the balance of convenience, considers which of the parties will suffer the greater harm from the granting or refusal of an interlocutory injunction pending a decision on the merits.

Modified Test for a Statutory Interlocutory Injunction to Enforce Municipal By-Laws

[37] Section 440 of the *Municipal Act, 2001, S.O. 2001, c. 25. 2006, c. 32* allows a municipality to bring an Application to restrain a person (or persons) from contravening its by-laws. It sets out the following:

Power to restrain

440 If any by-law of a municipality or by-law of a local board of a municipality under this or any other Act is contravened, in addition to any other remedy and to any penalty imposed by the by-law, the contravention may be restrained by application at the instance of a taxpayer or the municipality or local board.

[38] As in the motion before me, if an injunction is authorized by statute, different considerations apply from an injunction being sought at common law. The case of *Retirement Homes Regulatory Authority v. In Touch Retirement Living for Vegetarians/Vegans Inc.*, 2019 ONSC 3401 sets out how at para 47:

[39] Where a statutory injunction is sought:

- a) The Court's discretion is more fettered, and the factors considered by a court when considering equitable relief will have more limited application.
- b) An applicant will not have to prove that damages are inadequate or that irreparable harm will result if the injunction is refused.
- c) Proof of damages or proof of harm to the public is not an element of the legal test.
- d) There is no need for other enforcement remedies to have been pursued.
- e) The Court retains a discretion as to whether to grant injunctive relief. Hardship from the imposition and enforcement of an injunction will generally not outweigh the public interest in having the law obeyed. However, an injunction will not issue where it would be of questionable utility or inequitable; and
- f) It remains more difficult to obtain a mandatory injunction.

[40] Where it is alleged that a municipal by-law is being breached, the emphasis for injunctive purposes is on whether there is a serious question to be tried. If the municipality satisfies the first criterion, the usual remedy is for the court to grant an interlocutory injunction that restrains the ongoing breach (*Hamilton (City) v. Loucks*, ONSC, 2003 CanLII 64221, at para. 30).

[41] In this modified test, there is no need for the City to prove that it will suffer irreparable harm and there is no need to consider the balance of convenience because the public authority is presumed to be acting in the best interests of the public and a breach of the law is considered to be irreparable harm to the public interest (*The Township of Amaranth v. Ramdas*, 2020 ONSC 2428, at para. 54). However, in this modified test, the first criteria (serious issue to be tried) should be higher than the standard required when all three criteria are considered under the *RJR-MacDonald* test. A strong *prima facie* case must be established (*Hamilton (City)* at para. 37).

[42] Where by-laws of a municipality are being violated, a court ought to assist the municipality by granting interlocutory relief (*Municipality of Metropolitan of Toronto v. N.B. Theatrical Agencies, Inc.*, 1984 CanLII 2092 (ONSC), cited in *Hamilton (City) v. Loucks*, ONSC, 2003 CanLII 64221, at para 30).

C. Charter Issues

[43] Counsel for the Minister of Justice for Ontario made the following submissions considering the *ex-parte* nature of this motion.

[44] He pointed out that, as part of its role in considering the Respondents' rights in the matter, at common law and under the *Ministry of the Attorney General Act*, RSO 1990 c M.17, the Attorney General is the Chief Law Officer of the Crown and the guardian of the public interest of all Ontarians. It has the responsibility to superintend all matters connected with the administration of justice in Ontario.

[45] The underlying proceeding in this case raises such issues of public importance, including the impact of the Demonstration on public health and safety, the freedom of movement of Ontarians, and the rule of law.

[46] The Attorney General has special expertise in the *Canadian Charter of Rights and Freedoms*, which issues may have been raised by the Respondents had they been present. The Attorney General intervened in the recent matter of *Automotive Parts Manufacturers' Association v. Jim Boak*, CV-22-00030791, which resulted in an injunction prohibiting impeding access to the Ambassador Bridge in Windsor.

[47] The Attorney argues that there is irreparable harm done to the Province when there is open defiance of the City's by-laws.

[48] The Attorney argues that there is no need to consider the *Charter* in relation to a statutory injunction. The breaches are not protected by the *Charter*.

[49] And, the Attorney argues, that the right to expression under section 2(b) of the *Charter of Rights and Freedoms* is not greater than a citizen's rights pursuant to the City's by-laws. There is no doubt that freedom of expression, as guaranteed by s. 2(b) of the *Charter*, and the related rights of freedom of conscience, peaceful assembly and association are some of the most important rights of a free and democratic society. However, freedom of expression, like all other *Charter* rights, is not an absolute right nor an unqualified one. The *Charter* does not give any person the legal right to unlawfully trample on the legal rights of others. Every *Charter* right must be balanced against other important values and rights.

[50] He has cited the following cases and legislation, which I have considered here (*Ontario v Old Colony Mennonite Church*, 2021 ONSC 4638 at paras. 1 and 66; *Oglaza v JAKK Tuesdays Sports Pub Inc*, 2021 ONSC 7473 at para. 29; *Ontario (Attorney General) v Paul Magder Furs Ltd*, 1991 CanLII 7053 (ON CA) at page 7; *Ontario (Attorney General) v Paul Magder Furs Ltd*, 1992 CanLII 7704 (ON CA) at page 12; *Her Majesty the Queen in Right of Ontario v Adamson Barbecue Limited*, 2020 ONSC 7679 at paras 18-20; *Montréal (City) v 2952-1366 Québec Inc*, 2005 SCC 62 at para. 60, 67-68, 90, 94 and 99; *MacMillan Bloedel Ltd v Simpson*, 1994 CanLII 1731 (BC CA) at para. 38; *R v Banks*, 2007 ONCA 19 at paras. 115, 122, 129 and 131-132; *Batty v City of Toronto*, 2011 ONSC 6862 at paras. 3, 68-69, 85 85, 91-93, 96, 105, 108, 111 and 123; *Highway Traffic Act*, RSO 1990, c. H.8 a. Section 1 11 O. Reg. 69/22: *Declaration of Emergency* 12 O. Reg. 70/22: *Confirmation of Declaration of Emergency* 13 O. Reg. 71/22).

DECISION

[51] The evidence for the City in this matter is overwhelming. It not only satisfies the test for a common law injunction against the demonstrators pursuant to Section 101 of the *Courts of Justice*

Act and Rule 40.01 of the *Rules of Civil Procedure*, but it also satisfies the test for an injunction pursuant to Section 440 of the *Municipal Act*.

Common Law Injunction

[52] With respect to a common law injunction, the City has satisfied me that there is a serious issue to be tried here. There is a strong prima facie case that its by-laws are being breached and that the ongoing actions of the Respondents is an attack upon the rights of the public to live their lives unaffected by interference.

[53] I find that the City of Ottawa will suffer irreparable harm if the injunction is not granted. The Respondents are impacting the City's ability to perform essential functions and protect public safety. This is inhibiting them from fulfilling their obligations as a municipality.

[54] Justice Arrell's comments in *City of Brantford v. Montour et al.*, ONSC 6253, at para 35, apply in this case. When asked to assess the irreparable harm to a municipality in an injunction to respond to ongoing blockades, he stated:

In my view, the City will suffer irreparable harm, if that has not already occurred, if this situation is allowed to continue. I find as a fact, on the evidence before me, that the economy of this small city is at risk; the employment of members of the community are likewise at risk; the reputation of the City as a place to live, work and invest is at risk; the tax base is at risk; all as a result of the City being unable to regulate development, provide a conflict-free environment for investment, employment and the raising of families, and the inability of the City to ensure to local residents and the investment community that the rule of law prevails.

[55] In order to assess the balance of convenience, the Court must determine which of the parties will suffer the greater harm from the granting or refusal of an interlocutory injunction, pending a decision on the merits (*RJR, supra* at para 48).

[56] In assessing the balance of convenience, the court must consider the relative impact on the parties in granting or withholding the injunction. The other factors of the test will influence the weight to be given to the balance of convenience (Robert J Sharpe, *Injunctions and Specific Performance* (2019) Thomson Reuters Canada at 2.530-2.540).

[57] The City is not seeking a complete ban on the respondent's demonstration. The right to expression and peaceful assembly is an important right protected by the *Charter of Rights and Freedoms*. However, there is ample evidence that the respondent's current actions and flagrant disregard for the City's by-laws go far beyond exercising their right to protest. The Respondents' actions are significantly impacting the City's ability to perform essential functions.

[58] In considering the balance of convenience, the City refers the Court to the discussion in *Canadian National Railway Company v. Doe*, at paras 9 and 10, citing *Canadian National Railway v. John Doe*, 2013 ONSC 115, and *Canadian National Railway Company v. Doe*, unreported, which sets out the following:

[...] expressive conduct by lawful means enjoys strong protection in our system of governance and law, expressive conduct by unlawful means does not. No one can seriously suggest that a person can block freight and passenger traffic on one of the main arteries of our economy and then cloak himself with protection by asserting freedom of expression.

Freedom of expression and association do not provide a legal basis to illegally deprive others of the enjoyment of their legal rights to use their land, operate their businesses, or travel. Neither does it guarantee the right to amplify one's voice by trammeling others' rights. The rule of law must be the dominant policy. If people do not respect the law, then our rights become meaningless.

[59] The Freedom Convoy 22' participants' rights to freely express themselves do not allow that their activities can deny fundamental rights and freedoms to all those detrimentally affected by the Demonstration.

[60] On a balance of convenience, the City will suffer the greater harm from a refusal of the granting of an interlocutory injunction

The Statutory Injunction Pursuant to S. 440 of the *Municipal Act*

[61] Even though the City has satisfied its onus for a common law injunction, instead, I granted the injunction pursuant to section 440 of the *Municipal Act*. The nature of this case specifically calls for a statutory injunction.

[62] First, the matter was urgent when it was brought before me on February 14, 2022. The Demonstration had been going on for weeks without any relief to the City or its citizens.

[63] Second, the City is seeking an injunction to enforce several of its by-laws which it has established are being breached. There are no exceptional circumstances which would justify a refusal to grant the injunction here (*Newcastle Recycling Ltd.v. Clarington (Municipality)*, [2005] O.J. No. 5344 (C.A.) at para. 32).

[64] Third, the City has provided full and frank disclosure. The strong evidence of ongoing breaches of multiple municipal by-laws has satisfied me that there is a serious question to be tried. The only remedy for this court is to grant an interlocutory injunction that restrains the ongoing breaches (*Hamilton_(City)* at para 30).

[65] Fourth, there is no need to consider the balance of convenience for a statutory injunction to issue. The City of Ottawa is presumed to be acting in the best interests of the public and a breach of the law is considered to be irreparable harm to that public interest.

[66] Fifth, there is no need for other enforcement remedies to have been pursued as part of the City's efforts to obtain an injunction pursuant to section 440 of the *Municipal Act*. However, clearly, there have been enforcement measures attempted by By-Law Officers and the Provincial Court. Those attempts have failed due to the actions of the demonstrators.

[67] Sixth, any hardship from the imposition and enforcement of an injunction will not outweigh the public interest in having the City by-laws obeyed. And these breaches arising from the Demonstration are not protected by the *Charter*.

[68] As a result, an injunction pursuant to the *Municipal Act* is the appropriate remedy.

A handwritten signature in black ink, consisting of a large, stylized 'F' and 'M' intertwined, with a horizontal line extending to the right.

Associate Chief Justice Faye E. McWatt

Date: February 22, 2022